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Norwich to Tilbury

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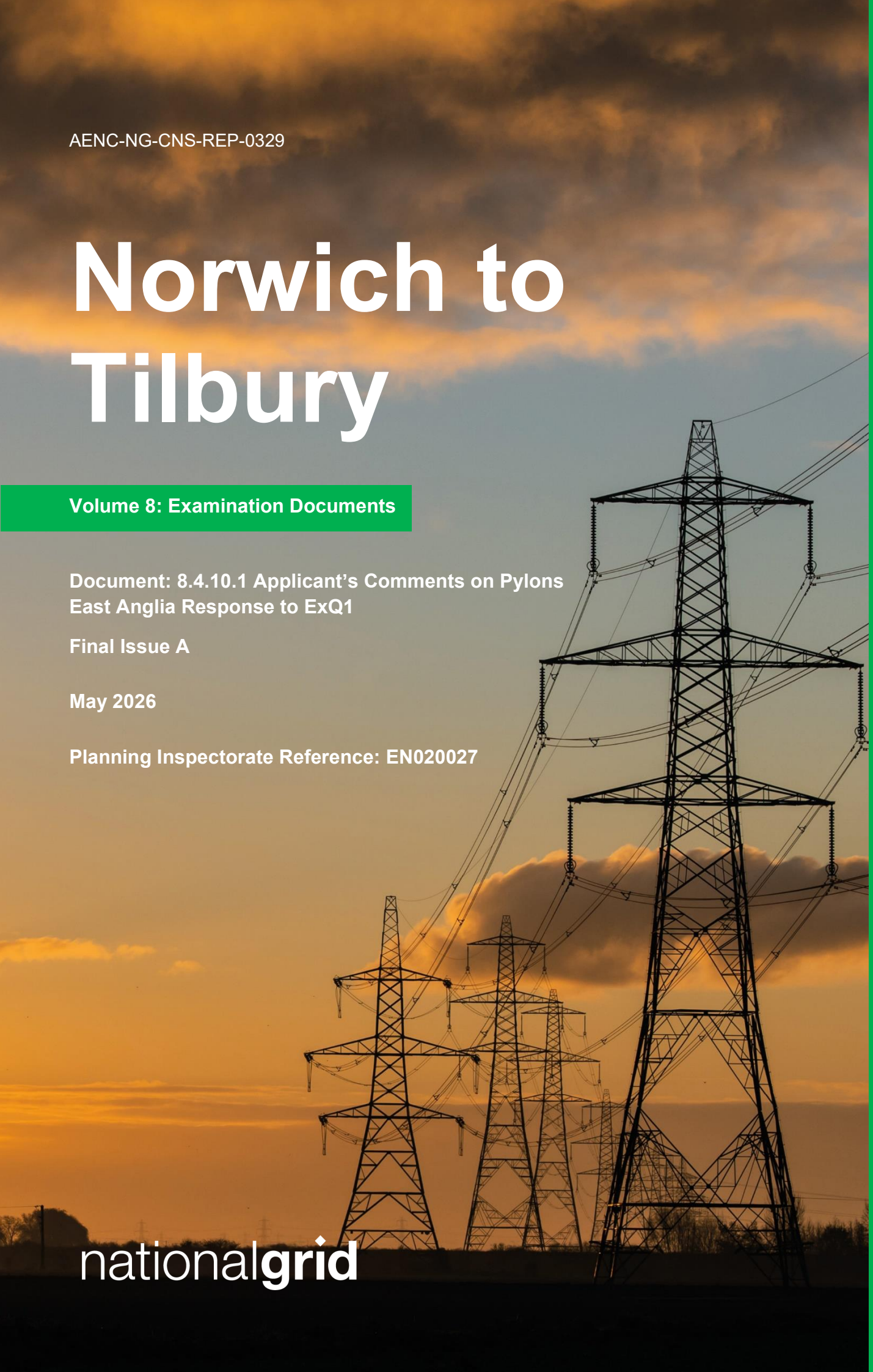

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1. Introduction

1.1 Purpose of the document

1.1.1 This document provides the Applicant's comments on responses provided by Pylons East Anglia (PEA) to the Examining Authority's first written questions (ExQ1) **[PD-014]**. Responses were submitted at Deadline 3, 10 April 2026 and published on 15 April 2026.

1.1.2 The Applicant has commented on responses submitted by other Interested Parties in **8.4.10 Applicant's Comments on Responses to ExQ1**. However, PEA submitted a number of detailed appendices with their responses to ExQ1, which form the majority of their submission, and to which the Applicant has also responded. Given the length of that submission and the Applicant's response, a separate document was considered most appropriate.

1.1.3 In this document, the Applicant provides comment on the PEA responses to ExQ1. The Applicant then provides comment on Appendices D-J as submitted by PEA **[REP3-132 to REP3-138]**. The Applicant provides comments on PEA Appendices A-C within its comments on the ExQ1 responses in Section 2 of this document, as they are referred to within the main PEA response to relevant question. Those appendices were provided in the main document REP1-131.

2. Applicant's Comments on Pylons East Anglia Response to ExQ1

Table 2.1 Applicant's Comments on Pylons East Anglia Response to ExQ1

Reference	Question to	Question	Response from PEA as provided in REP3-131	Applicant's Comments
BIO 1.12	The Applicant	**Assessment of bird mortalities** In paragraph 8.5.57 of ES Chapter 8 [AS-026] you state that no specific surveys for wintering farmland birds have been undertaken as they are not considered to be at risk of collision. A number of IPs, including Pylons East Anglia Ltd in its attachments to [RR-2973] and Suzanne Bolwell-Davies in [REP1-480], have raised concerns about the survey effort for, and impacts on farmland birds, and on birds overall due to collisions with OHLs and electrocution risk. Respond to these concerns and expand on the reasons why you consider surveys for farmland birds are not required and, in the absence of such surveys, explain in more detail how you have assessed the potential impacts on bird mortalities for all species due to electrocution risks and collisions for areas/ species that have not been surveyed. Justify your conclusion in Table 8.24 of ES Chapter 8 [AS-026] that: "…collision risk and potential mortality in the absence of mitigation is considered to be a negligible effect in the medium term which is not significant", and that therefore there would be no residual operational effect?	It is a fact that birds will die in collisions with Norwich to Tilbury and likely in high numbers. See Appendix A, Collisions with power lines in March 2026, which highlights the real-life harm caused by power lines, as well as our Bird Collision Matrix submitted at Deadline 2 and bird collision evidence submitted at Registration. Given that there are alternatives to OHL available, the Applicant should not be allowed to breach the Wildlife and Countryside Act 198, under which it is an offence to kill injure wild birds. We await the applicant's response to the ExA's questions, but would like to point out that bird diverters make no difference in low light, at night time or in fog conditions, as well as potentially being unable to give water birds sufficient time to avoid power lines when taking off from or landing at a familiar watering spot. We include in Appendix B our correspondence with Natural England, which makes it very clear that it will be for the Planning Inspectorate to consider the evidence around the risks to birds and that it agrees that there is a risk of collisions with overhead lines. None us can knowingly sit by and watch, knowing that overhead lines will result in countless horrific scenes of the type shown below. As Natural England says, "…overhead power lines can have the potential to increase bird mortalities, and we understand the wish to keep all such impacts to a minimum." Finally, we wish to add some sightings of non-passerines in farmland areas. In March a landowner confirmed to us that where they are, on the River Blackwater, Essex, crossed by the pylons, they regularly have two Cormorants, Little egrets, a Great Egret and Herons. All of these will be placed at direct risk if Norwich to Tilbury goes ahead as overhead lines. A second cormorant has been spotted one mile away from the line at Fordham. Farmland bird surveys are an absolute necessity, as is a response by the applicant to our Bird Collision Matrix supplied at Deadline 2, and acknowledgement that passerines are equally affected by collisions. Further we raise concerns to about the risk during construction to schedule 1 of the Wildlife and Countryside	Please refer to the Applicant's response to BIO 1.12 and BIO 1.13 of **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. The Applicant recognises that collisions between birds and overhead power lines can occur and acknowledges the concern raised regarding the potential for bird mortality. This matter has been fully considered within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** supported by detailed baseline surveys and assessment set out in **6.8.A8 Environmental Statement Appendix 8.8 - Wintering and Passage Bird Report [APP-167 to APP-170]** prepared in accordance with recognised good practice. The Project's assessment of bird collision risk is based on a robust desk study and survey approach. Wintering and passage bird surveys were undertaken in 2022 and 2023, including targeted vantage point surveys at locations where desk study analysis suggested collision risk is likely to be higher, such as watercourses, waterbodies and the wetlands / fields that are located along these corridors. The result of these desk studies and field surveys is that there were no locations where collision risks were likely to be significant. On a precautionary basis, mitigation in the form of orange spacers and bird diverters on the earth wire are proposed at the River Waveney and Ardleigh Reservoir as detailed in **7.4 Outline Landscape and Ecological Management Plan [REP3-030]**. The bird collision incidents presented in Appendix A occurred within the Stour and Orwell Estuaries Special Protection Area (SPA), Ramsar site and Cattawade Marshes Site of Special Scientific Interest (SSSI). These sites are designated on the basis that they are of value to birds; therefore, bird numbers and collision risk are considered high in this area. The Project has purposely been designed to avoid these designated sites, and as such, is situated over 3 km away. It is also noted that the location of the swan injury referenced is below smaller, lower voltage, pole supported lines. Often these smaller overhead lines present a higher collision risk to birds (particularly when located near wetlands and water features) compared to the 400 kV lines (400 kV overhead lines are proposed as part of the Norwich to Tilbury project). The lines in lower voltage networks are closer together, harder for birds to see and are lower in height (closer to the habitat features birds are using). In locations where bird mortality has been reported bird diverters are installed on these lines. Reaction time for birds to avoid lower voltage lines will therefore likely be lower than a 400 kV line which is generally more visible. The Project is proposing to
BIO 1.13	The Applicant	**The use of bird diverters** The ExA notes that bird diverters are proposed in two locations [APP-327]. Explain why these are not proposed in other locations where concentrations of birds may occur. What monitoring mechanism is in place in order to assess whether any other locations may need bird diverters installed in the future and how is the potential for such adaptive management secured in the draft DCO? Furthermore, what mechanism is in place for the monitoring of those locations where bird diverters are proposed? What adaptive management measures are proposed, such as additional mitigation or compensation, should monitoring indicate that bird diverters alone are insufficient to prevent		

Reference	Question to	Question	Response from PEA as provided in REP3-131	Applicant's Comments
		significant impacts on local bird populations, and how is this currently secured in the draft DCO?	Act 1981 species found along the route, such as Barn Owls, Red Kites and Treecreepers, for which it is an offence to recklessly disturb them on or near a nest containing eggs or young, when building a nest, or to disturb its dependent young. We are not convinced that the mitigation proposed is adequate, with use of terms such as 'where practicable' leaving the door open to the Applicant to do what they please. We do not agree with the Applicant that that with mitigation, there would be a negligible impact with no significant residual effect on Schedule 1 birds.	underground existing lower voltage lines where they would conflict with the proposed 400 kV overhead lines. In accordance with National Policy Statement EN-5 (2024), the Applicant has considered measures to reduce collision risk, including the use of bird diverters to increase line visibility where appropriate. Diverters and orange spacers are proposed to be installed in the Waveney Valley and Ardleigh Reservoir as a precaution. The Applicant notes comments regarding the effectiveness of bird diverters in low light conditions, fog or at night. While no single mitigation measure can entirely eliminate all collision risk, peer-reviewed evidence and industry experience demonstrate that diverters can materially reduce collision rates in many circumstances, particularly during daylight and crepuscular periods. The Project therefore applies diverters as part of a wider mitigation package, alongside careful routeing, span design and pylon placement, following the mitigation hierarchy. The Natural England quote identifies that overhead power lines have the potential to increase bird mortalities; this is not disputed and the reason for a robust survey scope to be designed and agreed with Nature England. It was also why collision risk was assessed as part of the impact assessment presented within the **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. Although no significant risk of collision was identified, precautionary mitigation in the form of spacers and diverters will be implemented. Within the same email from Natural England, they also state that with regards to Thames Estuary and Marshes SPA and Ramsar site and the Stour and Orwell Estuaries SPA and Ramsar site, '*we have considered whether the likely level of collisions with overhead power lines would be sufficiently numerous to have a significant impact upon overall population numbers at these two sites. In this case we have taken the view that they would not.*' Cormorant, egrets and herons have been recorded during the vantage point surveys designed to assess collision risk, and the distribution of historical records mapped as part of the desk study. As little egret is listed on Annex I of the EC Birds Directive (Directive 2009/147/EC) it was considered a Target Species while the other noted species were Secondary Species due to their lower conservation value. Collision risk to cormorant was considered further in the **5.3 Habitats Regulations Assessment Report [APP-082]** as it is listed as an Assemblage Species on the Stour and Orwell Estuaries SPA. The data collated on these species was comprehensive, as there was a focus on areas of higher quality habitat, but no areas of notable collision concern were identified. Inland habitats supporting small numbers of these species do not change the conclusions made within the **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**, and the **5.3 Habitats Regulations Assessment Report [APP-082]**. Responses to the supplied Bird Collision Matrix have previously been provided within pages 211 to 217 of **8.4.8 Applicant's Comments on any Further Information or Submissions Received by**

Reference	Question to	Question	Response from PEA as provided in REP3-131	Applicant's Comments
				Deadline 2 [REP3-070]. Please refer to these referenced responses for further details. It has been identified previously that the mortality numbers at Dungeness (which is used in the Collision Matrix) are not an appropriate comparison with the Project, as Dungeness is situated along the coast in an area known to be a resting/gathering point for migratory birds and a large RSPB wetland nature reserve. Dungeness is an important wintering ground that is used by birds when on passage. The Project is inland and away from important passage routes and wintering grounds which are known to be located along the coast and estuaries. The British Trust for Ornithology (BTO) numbers of ringed bird deaths across Essex, Suffolk and Norfolk due to overhead lines, do not differentiate between 400 kV and lower voltage lines (or indeed fences, wire meshing and telephone lines), which, as discussed above, have differing collision risks. This data covers records since 1908, with infrequent occurrences of death due to collision with overhead lines in comparison to mortality caused by collision with vehicles and buildings. The BTO data shows records of bird collisions on land with the main concentrations of collision with overhead lines located along the coast, near wetlands and close to built environments. Although the Bird Collision Matrix shows bird collisions with overhead lines do occur, it is not considered evidence that the Project poses a significant collision concern or that the survey coverage to inform the impact assessment is insufficient. Please refer to **8.4.8 Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [REP3-070]** for a comprehensive reply to passerine collision risk. The Applicant does not accept the assertion that the Project would result in a deliberate or unlawful breach of the Wildlife and Countryside Act 1981. The offence provisions of the Act are subject to tests of intent and recklessness, and the Project has been designed, assessed and mitigated specifically to avoid and reduce the risk of harm to birds as far as practicable. Where residual risks remain following mitigation, these have been transparently assessed within the impact assessment and determined not to be significant in Environmental Impact Assessment terms. The Applicant's consideration of alternatives, including undergrounding, is addressed in **6.3 Environmental Statement Chapter 3 – Alternatives [APP-127]** and supporting strategic option review documents. In line with national policy, overhead lines are the starting presumption for 400 kV transmission infrastructure in non-designated landscapes, and alternatives are assessed having regard to technical feasibility, environmental effects, deliverability, cost and system performance. Bird collision risk does not, of itself, justify a wholesale departure from this policy position, particularly where the risk has been assessed as not significant with appropriate mitigation. Regarding Schedule 1 species including barn owl and red kite (treecreeper is not a Schedule 1 bird), the usage of the term 'where practicable', specifically relates to the timing of vegetation removal. Vegetation removal will be carried out outside the bird breeding

Reference	Question to	Question	Response from PEA as provided in REP3-131	Applicant's Comments
				season wherever possible or 'where practicable'. Timing works in this way is the preferred approach for vegetation removal and follows the mitigation hierarchy in terms of avoiding disturbance to these protected birds. There may be cases where circumstances mean vegetation removal is proposed during the breeding season. In such circumstances, a pre-works survey will be undertaken and if Schedule 1 birds are found to be breeding, suitable stand-off zones, working restrictions and supervision will be put in place to ensure these birds are not disturbed. This approach is set out in the **7.4 Outline Landscape and Ecological Management Plan [REP3-030]**. The term 'where practicable' therefore does not give the Applicant a free pass to do what they please, and wildlife legislation will be strictly adhered to.
BIO 1.15	The Applicant	**Presence of white-clawed crayfish** At OFH3 [EV7-001] and [EV7-002] and in [REP1-432] Mr Norman Stevens states that studies by the Norfolk Rivers Trust indicate the presence of white clawed crayfish in the River Tas. Also, in [RR-1073] the Environment Agency notes that there are records of white-clawed crayfish on the River Tas (which is within the study area) and that they may be present where there are no recent records on the River Tas system and its tributaries. The ExA is aware that in paragraph 8.5.33 of ES Chapter 8 [AS-026] you have stated that desk studies revealed no records and field surveys revealed no presence of white-clawed crayfish in the Study Area. The ExA also notes that in N5 of [REP1-132] you have not specifically addressed the Environment Agency comments on this. Therefore please respond to Mr Stevens' and the Environment Agency's comments, explain whether a white-clawed crayfish licence from Natural England is likely to be required for any elements of the proposed development, and clarify how the potential presence of this species would affect the assessment conclusions you have reached in ES Chapter 8 [AS-026], including whether there are any ark sites nearby that might be affected. Please update Table 5.1 of the outline CoCP accordingly.	Further to our Deadline 2 submission we would like to add that while we agree that the Crayfish colony is not in in the Order Limits area, that is irrelevant, as the colony is downstream and therefore at risk from diffuse pollution issues. As a Species of Principal Importance which Natural England states Is vulnerable and endangered, the Applicant must adhere to Natural England advice. We believe that a map of the mitigation actions in relation to the WCC record(s) and the works in the areas should be supplied by the applicant, to include at a minimum: silt traps and pollution controls; timing works to avoid sensitive periods; habitat buffers; biosecurity protocols. We seek assurance that other areas, i.e. all tributaries of the River Tas crossed by the project, where works will impact the river have now been surveyed for WCF and found to be negative.	Please refer to the Applicant's response to BIO 1.15 **of 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. While white-clawed crayfish are known to be present within the wider River Tas catchment, no desk study records of white-clawed crayfish have been obtained within 2 km of the Order Limits, in the 10 years preceding 2022. Records for the invasive signal crayfish in the river catchment within the Order Limits were obtained as part of the desk study. As signal crayfish predate on native crayfish and carry a plague that is fatal to white-clawed crayfish, it is unlikely that the native species are present in the zone of influence for the Project. No ark sites were identified by the desk study. The overhead line would oversail the River Tas and have no effect on the banks where crayfish could reside. Proposed direct impacts to the River Tas are limited to one crossing between pylons RG49 and RG50 for a temporary construction haul road. This crossing would be a clear span bridge, which would not directly impact the riverbanks, the riverbed, the natural water flow or substrate and would therefore have no impacts to any white-clawed crayfish that may be present within the wider area. The Project would also cross water features that were identified as drainage ditches that are linked to the River Tas. These may be tributaries of the River Tas with banks that have been straightened. Many of these ditches appeared to dry out or hold limited amounts of water and so would be unsuitable for use by white-clawed crayfish. While signal crayfish can survive without water and can travel overland, white-clawed crayfish cannot and without water they desiccate and die. The River Tas, its tributaries, downstream habitats and water quality would be protected from pollution during construction of the Project by the standard pollution control and management measures that are secured through inclusion of commitments within **7.2 Outline Code of Construction Practice [Revision D]**. Measures include those to control runoff from worksites that may contain elevated concentrations of silt, as well as controls on potentially polluting activities such as refuelling and working with concrete, including protocols for unplanned events/spillages. In addition, due to the known presence of white-clawed crayfish within the River Tas in the wider area, specific biosecurity measures have been included within

Reference	Question to	Question	Response from PEA as provided in REP3-131	Applicant's Comments
				7.4 Outline Landscape and Ecological Management Plan [REP3-030] to ensure no spread of crayfish plague, as agreed with the Environment Agency. As identified within **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** a 10 m buffer is to be applied for works close to all watercourses to ensure that there are no effects on water quality. There would be no significant residual effects to the white-clawed crayfish at the River Tas or any other river within/adjacent to the Order Limits. For these reasons it is not considered necessary to undertake further surveys for white-clawed crayfish or to map specific mitigation measures in relation to white-clawed crayfish as the mitigation measures are required to safeguard the aquatic environment throughout the length of the Project, protect downstream habitats and avoid impacts to other aquatic flora and fauna. Water quality is to be protected in all watercourses that interact with the Project irrespective of the presence / absence of white-clawed crayfish.
DES 1.3	The Applicant	**Independent design review** The Design and Access Statement [APP-353] states in Appendix B that in the context of independent design review there is no intention to include design reviews post-consent (if consent is granted) as the project is "deemed to be achieving and meeting Good Design". In addition to the above, the ExA note that a number of IPs have indicated the need for an independent design review to be secured as part of any DCO made. In the light of the applicant's Design and Access Statement [APP-353], especially Appendix B – Internal Design Review Note, the ExA is not persuaded, on the basis of the evidence provided to date, that a non-independent design champion(s) would be adequate or that a full independent Design Review Panel for the Proposed Development is not required. Provide further justification for your view that independent design review is not needed for the proposed development. Refer in your reasoning to the Planning Inspectorate Guidance Note Advice on Good Design. The ExA also note that the development consent order for the Five Estuaries offshore wind farm included a provision within requirement 5 to ensure that the onshore substation for that project will be subject to an independent design review and this should be referred to in your reasoning.	Both the 2023 and 2025 versions of EN-1 reference the "Design Principles for National Infrastructure" published by the National Infrastructure Commission (NIC) in February 2020. These principles are also incorporated in guidance on Nationally Significant Infrastructure Projects issued by the Planning Inspectorate. A key principle is that independent design review panels should be set up for every Nationally Significant Infrastructure Project. The Planning Inspectorate Section 51 (s51) advice records for Norwich to Tilbury show that the NIC guidance was highlighted to the Applicant in pre-application meetings from 30 January 2023 onwards. However, at the s51 meeting held on 30 June 2025, when asked whether independent design reviews had been undertaken on the project, the Applicant responded that this was not the case. This represents a major non-conformance to the prescribed design process for Nationally Significant Infrastructure Projects. The principle is that an independent multidisciplinary team of experts provide impartial advice at key stages in the design process from inception to completion. Design reviews are therefore not effective if applied retrospectively when the outcome has largely been determined and therefore very limited opportunity to inform the design. Instead, a significant opportunity has been missed for valuable external input to be fed into the Norwich to Tilbury design process. This input not only helps the Applicant to meet the requirements for "Good Design" but can also provide interested parties with more confidence in the resulting design and thus build engagement and support	Please refer to the Applicant's response to DES 1.3 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. This sets out in detail the Applicant's proposed approach to ensuring good design post-consent both through Development Consent Order-secured commitments and the Applicant's established governance arrangements. The Applicant therefore remains of the position that a dedicated independent design review panel is not necessary to secure good design outcomes for the Project. **The Applicant provides a detailed response to PEA Appendix D at Section 3 of this document.**

Reference	Question to	Question	Response from PEA as provided in REP3-131	Applicant's Comments
			for the project. Appendix D sets out the requirements for good design in detail, sent as separate attachment.	
DES 1.10	The Applicant	**T-pylons (1)** The ExA note that in [REP1-069] you imply that it is technically possible to use T-pylons in combination with standard steel lattice pylons, and whilst you have discounted their use, the ExA wish to explore this further: Therefore, please explain: • How the eight areas assessed were chosen and why other areas were not; what was the criteria for choosing these sections of the route for consideration and were any other stretches of the route considered for their use, and if not, why not? • Were they considered for the area around Ingatestone, and if not, why not? • Whether the use of both pylon types would be a simple hybrid solution or whether additional infrastructure is required between the two types of pylons. • If additional transition infrastructure is required, explain what this is and provide plans showing the appearance of these structures and where they would need to be located for each transition. • Are there any technical constraints to a more recessive colour being used (noting that they are generally light grey). In addition, provide visualisations to support your claim that T-pylons would not mitigate landscape and visual effects. Use some of the following VP's to illustrate this (worst-case scenario examples): • 1.07 to 1.12; 1.14, 1.15, 2.06 to 2.12; 5.04, 5.05, 6.13 to 6.16; 7.08, 7.09, 7.12	We seek to understand why the applicant has not considered the far lower pylons required by using more up-to-date conductors, such as TS Conductor or as considered by Bute Energy, "*The ACCC (aluminium conductor composition core) Cardiff is also crucially designed to provide higher capacity and reliable long-term performance. Green GEN Cymru will deploy the variant on L7c pylons. At a standard 27m tall and 5m wide, these pylons are half the size of typical 400 kV towers*".	The respondent suggests that conductor choice has enabled Green GEN Cymru to choose smaller pylons. This is not accurate. The circuits referred to are 132 kV. The lower pylons come from the lower voltage. There is no possibility that the increase in transmission capacity required of Norwich to Tilbury could be achieved in an economic and efficient manner using 132 kV circuits. These examples do not show a viable alternative. The circuits referred to above are constructed at 132 kV not 400 kV and carry a lot less power than the 400 kV network. They are not comparative at all with the proposals set out, nor with the deficits the Applicant has set out. The needs case in Section 3: Need Case, Table 3.3, page 31, of **7.17 Strategic Options Backcheck and Review [APP-355]**, and replicated below, states the existing system capabilities, highlighted by the purple box, and the amount of energy that is expected to transfer across system boundaries. Table 3.3 Planned Transfer requirements Planned Transfer | Post Fault Capability by 2031 | Planned Transfer Boundary Deficit EC5N (Maximum) | 15,774.0 MW | 6,652 MW | -9,122 MW EC5 (Maximum) | 24,834.7 MW | 13,552 MW | -11,531 MW EC5N (Minimum) | 14,171.7 MW | 6,652 MW | -7,520 MW EC5 (Minimum) | 23,232.4 MW | 13,552 MW | -9,928 MW The pylons described above are 132 kV pylons, which are smaller as they are a lower voltage and therefore have different clearance requirements. However, 132 kV circuits have an International Electrotechnical Commission substation rating of 2000 A and at 132 kV this relates to a circuit capacity of 460 MVA or 920 MVA for a double circuit. This is compared with the 3465 MVA circuit rating and 6930 MVA double circuit rating achieved with the 400 kV connection with its IEC 5000 A rating. Even if 5000 A were achievable at 132 kV, which it is not, this would only achieve a power rating of 1150 MVA single circuit and 2300 MVA for a double circuit. Therefore, a 132 kV solution and an integrated 400 kV transmission solution are not comparable.
GEN 1.6	All local authorities MOD Natural England Environment Agency Any IPs who wish to	**Critical national priority** The planning statement [APP-085] references the need for the proposed development in the context of the urgent need for renewable energy generation within the UK, and in doing so, it refers to the presumption specifically in relation to critical national priority (CNP) infrastructure. Paragraph 4.2.7 of NPS EN-1 (2023) makes it clear that the CNP policy does not create an additional or cumulative need case or weighting for each type of energy infrastructure. The policy	We submit an opinion by Lord Charles Banner KC sent as separate Appendix E. On the basis of this opinion, we would like to reiterate our requests for ISH's to address alternatives in detail. We remind the panel that NPS EN-1 states that CNP must be 'the right kind of technology', at the 'right time' and in the 'right place' (1.1.7). Norwich to Tilbury as overhead lines is none of these things. We also remind you that an appropriate balance must be struck between cost, timeliness and minimizing community and environmental harm (1.1.8). There has been no balance struck in the proposal presented by the Applicant.	The Applicant acknowledges the reiteration of points previously made by Pylons East Anglia, and which have been responded to by the Applicant at previous deadlines including: • 8.4.6 Applicant's comments on submissions received at Procedural Deadline A [REP1-136], Table 4.1 • 8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139], various

Reference	Question to	Question	Response from PEA as provided in REP3-131	Applicant's Comments
	make comment	applies following the normal consideration of the need case, the impacts of the project, and the application of the mitigation hierarchy. It will be given consideration by the ExA when making its recommendation to the Secretary of State, who will apply the CNP policy in its decision making specifically in reference to any residual impacts that have been identified. NPS EN-1 paragraph 4.1.7 notes that for projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases. Paragraphs 7.2.7 to 7.2.28 of the planning statement [APP-085] sets out a summary of the potential residual impacts (non Habitats Regulations Assessment (HRA) impacts) which may remain after the mitigation hierarchy has been applied. These relate to the relevant exceptions listed in the CNP policy at NPS EN-1 paragraph 4.2.15: human health and public safety, defence, irreplaceable habitats, the achievement of Net Zero, and flood risk. Paragraph 4.2.17 of NPS EN-1 sets out that the Secretary of State will also take as a starting point that CNP infrastructure will meet a number of policy tests including in relation to green belt, sites of special scientific interest (SSSI), nationally designated landscapes and heritage assets. IPs are invited to review the applicant's consideration of CNP in the planning statement [APP-085] (in particular paragraphs 7.2.52 to 7.2.257) and the policy compliance tracker [REP1-133] (tables 1.4 and 1.5), and state if they agree with its approach, including in respect of the updated NPS published in December 2025 (which the ExA considers to be an important and relevant consideration in decision making) In particular the ExA requests all local authorities and the listed statutory consultees to provide comment on the policy tests on matters of human health and public safety, defence, irreplaceable habitats, flood risk, green belt, sites of special scientific interest, nationally designated landscapes and heritage assets, as well as the HRA.	Meanwhile, 3.3.64 allows room for other novel technologies that may emerge. One such is TS Conductor. We remain of the view that the Applicant has not presented any evidence of why TS Conductor is not a suitable technology to upgrade the existing grid. This would reduce harm, reduce costs and increase speed of delivery. Even if an upgrade is not possible, why has the Applicant not considered TS Conductor's technology for the Norwich to Tilbury proposal? It would require fewer and lower pylons, thus reducing cost and harm. Why has the Applicant not considered cable ploughing, both for the undergrounding currently proposed through the National Landscape and for the entire route either AC or DC. Cable ploughing reduces costs, harms and time. With regard to your request in GEN 1.6 for comment on *"the policy tests on matters of human health and public safety, defence, irreplaceable habitats, flood risk, green belt, sites of special scientific interest, nationally designated landscapes and heritage assets, as well as the HRA"*, we draw the Inspectors' attention to all of our previous and current submissions specifically addressing the legal requirements for the Applicant to avoid: • Flood risk • Heritage harm • Harm to human health -acid sulphate soils being of a direct risk to humans -- farmers being placed at unknown risks from operating near OHL's). We also believe that the concentration of energy in hubs at Bramford and Twinstead leads to an unacceptable national security risk, as does the use of OHL's when underground HVDC would be secure against attacks and climate change. See our response to SS 1.1 and 1.2 below. Sir Bernard Jenkin, MP, has written to the Rt Hon Michael Shanks on this point this week to raise concerns. Finally, we remain of the opinion, as per our initial submission at registration for the DCO, that the time urgency presented by the Applicant is overplayed. As we then stated, Hiorns (in his study for the county councils) was correct that wind farm construction would be delayed, and our own tracker shows an average 4.22 year delay beyond planned build date for wind farms (and very similar for interconnectors). We still do not understand the Applicant's assertion that there is a requirement for 28,756MW of capacity, when our analysis of NESO's 2024 Anglia Study seems to indicate that only 9,980 MW additional capacity is required1, as per our submission at registration. We have previously seen documents which indicate that only 4GW of capacity is required in Norwich to Tilbury, not 6GW, which would	• 8.4.8 Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [REP3-070] (from page 190) **The Applicant provides a detailed response to PEA Appendix E in Section 4 of this document.**

Reference	Question to	Question	Response from PEA as provided in REP3-131	Applicant's Comments
			make HVDC undergrounding an even more interesting comparison as an alternative.	
HE 1.17	Pylons East Anglia Ltd	**Pylons East Anglia written representation 1** The ExA acknowledge the concerns of Pylons East Anglia [REP1-267] regarding the number of heritage assets scoped out of the applicant's assessment. It would be useful to the ExA if you were able to provide a comprehensive list of those assets that have, in your professional advisors' opinion, been erroneously scoped out, and the reasons for your decisions, although please note that this does not need to be as comprehensive as the case studies you have provided. Furthermore, it would be useful to the ExA for your advisors to provide a list of those assets that have been assessed, but they disagree with the assessment made, and why. Again, this need not be as comprehensive as the case studies provided.	By separate Appendix F, we include a submission by Virginia Brewer, Head of Heritage at Bidwells. Further detail is provided in accompanying Appendices as follows: • G. Supporter submissions, a spreadsheet with analysis of the Applicant's consideration of the impact on heritage assets • H. The impact on archaeology in Fordham, Essex, particularly on asset 4081. • I. The impact on Bounds Farm, Ardleigh, Essex. • J. The impact on Flordon Hall, Norfolk.	The Applicant has reviewed the documents supplied in PEA Appendix F to J and has provided a detailed response to them in this document: • Appendix F -Section 5 of this document • Appendix G – Section 6 of this document • Appendix H – Section 7 of this document • Appendix J – Section 8 of this document • Appendix I – Section 9 of this document
LUS 1.4	Natural England All local authorities Pylons East Anglia Limited	**BMV and soils - 3** To what extent are the mitigation measures proposed by the applicant in the outline CoCP (measures GH02 and GH08) sufficiently robust to address issues should acid sulphate soils be encountered during construction.	Firstly, we remind the panel that acid sulphate soils can cause harm to human health. The proposed mitigation measures: GH02 asserts that the contractors will undertake a Foundation Works Risk Assessment for any activities likely to disturb acid sulphate soils and/or potential acid sulphate soils; GH08 promises a protocol (yet to be devised) to deal with any unexpected contamination. In view of National Grid's resistance to any prior testing for acid sulphate soils and potential acid sulphate soils (even though we have advised them what they need to do), these measures are unconvincing and unacceptable. The works contactors are unlikely to recognise an acid sulphate soil if they see one. Certainly, they will not recognise a potential acid sulphate soil unless they carry out the tests that we have recommended. Dealing with the problem once they have created it is by no means straightforward, even if it is detected quickly. If it is not detected, then the ecosystem is immediately and irreparably damaged. Crayfish will be amongst the first losers. When it comes to soils and early decision-making about the project type/route, we are in strong disagreement with the scoping out of soils on the basis that they would not have a significant effect. From: Document: **7.18 "2022 - Corridor and Preliminary Routeing and Siting Study" [APP-356]** "2.29 Topics such as air quality, soils and geology, and water were scoped out of the Options Appraisal process on the basis that at this phase of the Project with the constraints above already applied, that these topic areas would not have a significant effect on the	There is no evidence from surveys undertaken to indicate the presence of actual acid sulphate soils within the surveyed areas from the field survey. The Applicant recognises that this conclusion is based on point data from detailed surveys and accepts that it does not fully rule out the possibility of acid sulphate soils occurring locally, as such soils can be sporadic in distribution. Should any evidence arise during construction, appropriate investigation and mitigation measures would be implemented in accordance with good practice and the requirements of the **7.2 Outline Code of Construction Practice [Revision D]**, specifically measure GH08, which provides protocol to deal with unexpected contamination. To ensure the aspects of potentially acid sulphate soils are specifically set out, the final Soil Resources Plan will include a section detailing the measures which will be put in place based on the locations and depths of actual works so that any investigations and supervision can be targeted. Acid sulphate soils could be identified as unexpected contamination, triggering investigation and response. Toolbox talks on acid sulphate soils will be developed by the Soil Scientist to ensure contractors are aware of the risks and identification methods. In areas such as the Waveney Valley, where potential acid sulphate soils may be encountered, the Soil Scientist will be on-site to oversee works and provide guidance on the identification and isolation of affected areas and appropriate treatment or off-site disposal of acidic materials. This approach ensures proactive risk management, specialist oversight, and compliance with industry best practice to minimise potential harm to human health and ecosystems. Commitment GH02 in the **7.2 Outline Code of Construction Practice [Revision D]** secures the requirement for a Foundation Works Risk Assessment to be undertaken where piled foundations are anticipated, and was not intended for acid sulphate soils.

Reference	Question to	Question	Response from PEA as provided in REP3-131	Applicant's Comments
			determination of the preferred route for the connection or substation siting". Clearly this is a nonsense, not only when it comes to acid sulphate soils but also in avoiding best and most versatile farmland.	However, GH01 secures the requirement for intrusive ground investigation prior to construction to inform appropriate geoenvironmental assessment and geotechnical design. GH08 secures the requirement for an unexpected contamination protocol to be developed which would include details of watching briefs and toolbox talks, preparation of method statements, development of an escalation policy and details of any verification procedures. As set out in **5.6 Planning Statement [APP-085]**, the Project has sought to minimise impacts on Best and Most Versatile (BMV) agricultural land as far as practicable and includes mitigation measures to reduce impacts on the soil resources and on agricultural activities (as set out in **6.6 Environmental Statement Chapter 6 – Agriculture and Soils [APP-138]**). Given the predominance of BMV land within East Anglia, it has not been possible to avoid both temporary and permanent effects on this resource. The routeing and siting selection process confirms that there are no other suitable sites of poorer agricultural quality that can accommodate the Project.
SET 1.2	The Applicant	**Study commissioned by Scottish Renewables entitled 'house prices: impact of Beauly Denny grid infrastructure' (BiGGAR Economics, 2024**). ES Chapter 15 [APP-265] at paragraph 15.3.7 refers to a study commissioned by Scottish Renewables in relation to the operation of the Beauly-Denny power line entitled 'house prices: impact of Beauly Denny grid infrastructure' (BiGGAR Economics, 2024). The ExA asks you to: a) signpost where this document has been provided in the application submission or provide this document. In either case provide a synopsis of the findings of the document; and b) advise whether any similar study has been undertaken in relation to the impact on non-residential properties, whether in relation to the Beauly Denny power line or other similar development. If such a study or studies have been undertaken please signpost where that information has been submitted into the examination or provide that study, along with a synopsis of the findings.	This project has already had an impact on house prices, with people reporting having to drop asking prices or set a lower guide price than without the pylons. We set out the evidence for the impact of overhead lines on house prices and mortgage availability in Appendix B, and we point out again the need for the Treasury Green Book to be followed to assess these impacts. For example, when buyers consistently pay less for properties near pylons, or when prices fall after a line is built, that price differential is not mere sentiment — it is a market-based measure (a revealed preference) of how much people value the loss of amenity, visual quality, peace and quiet, and perceived safety. The Green Book's framework requires that all significant costs and benefits to society be counted, and house price impacts are one of the most empirically well-established ways of measuring environmental disamenity in monetary terms. 8.14 One method of revealed preference valuation is hedonic pricing. This examines the different market and non-market factors that affect the price of a particular good or service. For example, practitioners can estimate a monetary value for green space by examining how average house prices vary with the amount of green space in different areas. The resulting correlation shows the additional monetary value that nearby green space adds to a property." Underground cables do not cause the same visual intrusion and therefore do not cause the same house price depression. A proper Green Book-compliant whole-life cost comparison between overhead and underground options must therefore include the monetised house price impact on the affected corridor as a social cost attributable to the overhead option. The failure to do so artificially	Please refer to the Applicant's response to SET 1.2 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074].** The Applicant has further provided an addendum to its response to SET1.2 at Deadline 4 in **8.9.1.2 Addendum to ExQ1 SET 1.2, SET 1.3, SET 1.6** in response to the ExA's Rule 17 Request **[PD-019].** For ease of reference, this is provided below: The ES refers to the 'House Prices: Impact of Beauly-Denny Grid Infrastructure' (BiGGAR Economics, 2024) study that was commissioned by Scottish Renewables to consider the effects on property values arising from the operation of the Beauly-Denny OHL in paragraphs 15.3.7-12 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism** [APP-265]**.** Those paragraphs of the ES confirm that the conclusion of that study was that the Beauly-Denny OHL, a 130-mile-long electricity transmission line that became fully operational in 2015, with properties located very close to the OHL, where visual impacts could not be mitigated by screening and where there was an audible hum and/or a perceived health risk, had limited effects on properties offered for sale. The study also concluded that those limited effects were not an issue for all purchasers, such that the actual effect was a matter of individual perception. The study looked at house prices along the route of the OHL and compared them to house prices in both the local regions and in Scotland between 2004 and 2022. This enabled consideration of effects during the construction phase and during the first seven years of operation. It also detailed discussions with local estate agents along the line of the route to understand their views. The study demonstrated that while there had been a 14% reduction in the volume of house sales in the area of the OHL route, compared to Scotland (where there was a 4% increase), house price growth in the area was greater since 2015 (41%) when compared to the rest of Scotland (30%).

Reference	Question to	Question	Response from PEA as provided in REP3-131	Applicant's Comments
			flatters the overhead option's cost-benefit ratio. The results from the BiGGAR Economics study (2024) differ greatly from direct experience of the Norwich to Tilbury project. This project has already had an impact on house prices, with people reporting having to drop asking prices or set a lower guide price than without the pylons. We set out the evidence for the impact of overhead lines on house prices and mortgage availability in Appendix x We note that the BiGGAR Economics study relates to a single project located in a region with a very different character to the proposed location for the Norwich to Tilbury project. The report states for example that the power line will "pass through some of Scotland's inaccessible terrain". To assess the impact on house prices for the Pylons East Anglia "Norwich to Tilbury Project Green Book Analysis"2, the more generalised London School of Economics study "Are friends electric? Valuing the social costs of power lines using house prices"3 was chosen. The LSE report states: "our findings suggest that overhead power lines depress housing prices within 1500 meters from power lines by around 3.9%". Testimonials indicate that house prices have already dropped. The impact will vary enormously depending for example on the location and the type of the property, but potential losses in value of up to 30 or 40% have been reported by several sources4.	The study also concluded that once the OHL had been constructed, and could be seen by potential house purchasers, effects fell away to be replaced by more usual considerations for house purchasers, such as interest rates, cost of living and supply of houses. As such, the overall conclusion of the study was that there was no discernible effect as a result of the operation of the Beauly Denny OHL. The Applicant acknowledges the information provided by Pylons East Anglia, which is anecdotal, and which does not change the position of the Applicant as set out above. The Applicant further acknowledges that Pylons East Anglia refer to the need for a Treasury Green Book analysis. As the Applicant has stated previously, e.g. on page 15 of 8.5.4 Applicant's Response to the Open Floor Hearings [REP1-140]: 'the Treasury Green Book provides guidance on the interpretation by public servants of public spending, assets and resources for projects, policies and spend from the public purse. That is not relevant for National Grid Electricity Transmission. There is no requirement in the Planning Act 2008 for developers to have to submit a Treasury Green Book assessment as part of a Development Consent Order (DCO) application. National Grid Electricity Transmission is an Ofgem regulated business, with obligations to consider customer, environmental and other considerations as outlined in the Electricity Act 1989 and in its licence commitments. Consideration of the costs of a project and the funding it should receive via the regulatory settlement is the subject of a separate regulatory process, and it is not appropriate for the Planning Inspectorate, Examining Authority or the Secretary of State in their remit under the Planning Act 2008 to seek to duplicate other regimes.' Properties may in very specific circumstances also qualify for compensation via the Compensation Code and Part 1 Claims within the Land Compensation Act 1973.
SS 1.1	The Applicant	**Bramford substation** Detailed resilience, security and continuity concerns have been raised by Burstall Parish Council [REP1-151] and Mr William Petersen [REP1-495] over the scale and size of the Bramford substation site given the concentration of nationally critical energy infrastructure at the site, which would be added to by the proposed development. Respond to such concerns in detail, including reference to EN-1 and EN-5 where relevant.	We believe that the risk of nationwide blackouts has been overlooked in grid upgrade • 30% of the UK's power passes through one substation, Bramford, creating a security risk. • North Essex (Ardleigh), Norwich Main and Suffolk Coastal energy hubs create further risk. • Overhead lines are particularly vulnerable and underground lines do not suffer the same risks. Recent conflicts underline why the resilience of energy infrastructure matters. Russia has systematically targeted Ukraine's energy infrastructure. Iran's long-range missile attacks have demonstrated weapons assessed as capable of reaching the UK and the rapid proliferation of low-cost drones show that distance and geography no longer guarantee protection. The UK homeland and its Critical National Infrastructure cannot be assumed to be beyond reach. Senior UK and allied military leaders have publicly warned of persistent "grey-zone" threats, including sabotage and	Please refer to the Applicant's response to SS 1.1 and SS 1.2 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** which set out in detail the embedded design measures that are integral to Project development and provide a review of security considerations required under National Policy Statement (NPS) EN-1 (2024) and NPS EN-5 (2024). The Applicant considers its responses to SS 1.1 and SS 1.2 address the points raised by Pylons East Anglia and therefore reserves further comment until Pylons East Anglia has reviewed the Deadline 3 submission.
SS 1.2	The Applicant	**Security risks** A range of security issues have been highlighted as a possible risk by a number of IPs in relation to the OHLs and substations, including vulnerability to attack (for example by drones), and the resilience in areas where there is a concentration of energy infrastructure. NPS EN-1		

Reference	Question to	Question	Response from PEA as provided in REP3-131	Applicant's Comments
		(2023) section 4.16 recognises that there may be national security implications for critical energy infrastructure. Can the applicant respond to these points, clearly setting out the security considerations for the proposed development and which may result from the concentration of other UK energy infrastructure in the surrounding East Anglia area.	infrastructure interference. Yet the design of our energy infrastructure is blind to the threat, with assets being concentrated and in cases forming single, highly concentrated points of failure. Political discussions of "energy resilience" overwhelmingly focus on security of supply—producing energy domestically rather than importing it. The resilience of the infrastructure itself is overlooked. This distinction is critical. Power generation is irrelevant if the infrastructure that stores, balances or transmits it is disabled for weeks or months. National policy and NPSA guidance are clear: resilience must be designed in from the outset, not retrofitted. There is no evidence that this principle has been applied. Instead, ease of connection and concentration appear to have been prioritised over dispersion, concealment and redundancy. The Electricity System Restoration Standard (ESRS) requires preparation for worst-case but plausible scenarios, including prolonged outages but assumes the network is intact. A National Preparedness Commission report (November 2025) warned that the UK's high-value energy assets — interconnectors, LNG terminals, and offshore wind transmission hubs — are geographically concentrated and lack sufficient physical protection against hostile acts The lack of resilience planning is stark at the Bramford Substation, Suffolk, where a staggering 30% of the UK's power is due to converge. A large and growing single concentrated site critical to the supply of electricity to the south east and London, fast becoming encircled with large-scale lithium-ion battery installations, carrying fire, toxic plume and environmental risks with potentially national consequences. What is the plan if Bramford were disabled by accident, fire or hostile action? This is no longer a local planning matter. It is a question of national resilience, security and continuity. No longer "just a substation", it is an extraordinary concentration of exposed, nationally critical infrastructure, located on elevated, highly visible ground, three miles from Ipswich. Renewable energy must be delivered safely, securely and intelligently. A site carrying a substantial proportion of the UK's electricity is being allowed to evolve into a critical vulnerability, without a cumulative resilience assessment, clear accountability, or worst-case planning	

3. Applicant's Comments on PEA Appendix D The Requirement for Good Design [REP3-132]

3.1.1 The Applicant provides its comments on Appendix D of the PEA Response [REP3-132] below.

Table 3.1 Applicant Comments on PEA Appendix D [REP3-132]

Matters	Applicant Response
This report discusses key areas of the Norwich to Tilbury project that are essential to meeting the requirement for "good design". Good design is a fundamental requirement within the National Policy Statements for Energy, and it provides the route to meeting many of the policy objectives. Critically, the Secretary of State has a statutory duty to achieve good design. As emphasised in Section 4.7.1 of the Overarching National Policy Statement for Energy, EN-1 (2023 & 2025): "…high quality and inclusive design goes far beyond aesthetic considerations. The functionality of an object – be it a building or other type of infrastructure – including fitness for purpose and sustainability, is equally important." The requirement for good design applies to Critical National Priority (CNP) projects as much as any other project. The associated principles provide the means to ensure that the mitigation hierarchy for such projects is properly addressed. The Design Principles for National Infrastructure published by the National Infrastructure Commission (NIC) in February 2020, are embedded in the National Policy Statements for Energy. The NIC report states: "We are moving into a decade where many big infrastructure projects will begin. Their legacy will be defined by the quality of their design. We owe it to present and future generations to make them the best they can be. These principles are here to show the way". Noting the scale and planned lifespan of the proposed infrastructure, "legacy", as referenced in the above NIC quotation, is a very important consideration. The Norwich to Tilbury project has been stated by the Applicant to be one of the largest DCO applications. With ongoing refurbishment, the lifespan could exceed 100 years: the harm caused could extend significantly beyond this.	*Design Evolution* Good design of electricity transmission infrastructure is achieved by application of the Holford and Horlock Rules, alongside an iterative design approach informed by stakeholder engagement, relevant sections of national policy (National Policy Statement (NPS) EN-1 (2024) and NPS EN-5 (2024)) and the embedded environmental design mitigation as part of the Environmental Impact Assessment (EIA) process. Such good design principles are then intertwined with the technical design requirements alongside the regulatory and other constraints such as operational, safety and security requirements for new electricity transmission infrastructure. The objectives of the Project are manifold and are set by statute, NPSs, statutory guidance and ministerial and other guidance. In short, the Project seeks to meet the identified urgent need for critical national priority infrastructure in East Anglia. National Grid undertakes options appraisal to identify the most appropriate way to meet the identified need. There are often a number of different ways that the defined need could potentially be met, involving different locations, technologies or designs. Each appraisal which is undertaken for that purpose requires judgements and decisions about the best way to achieve the required outcome which define the project to promote. The options appraisal process provides information to help inform those judgements. Options appraisal is a robust and transparent process that is used to compare options and to record the positive and negative effects they may have in meeting the defined need, across a wide range of criteria including environmental, socio economic, technical, and cost factors. The aim is to find a balanced outcome to meet the identified need while meeting National Grid's statutory duties. Further details on the options appraisal process can be found in Our Approach to Options Appraisal[1] and in Our Approach to Consenting[2]. The options appraisal for the Project followed the above approach and involved a hierarchical assessment starting from strategic alternatives (such as broad technology choices and geographic areas) to select a preferred Strategic Proposal, i.e. the Project, which is then defined in detail through further design and assessment work. This proposal was then subject to routeing and siting to determine an alignment for the Project, which was subsequently refined following statutory and non-statutory pre-application consultation. Finally, alternative construction methods were considered. The iterative design process has been informed by extensive stakeholder engagement, engineering and environmental surveys, technical assessments and refinement. It has culminated in the identification of Limits of Deviation through careful routing and siting – now narrowed to detailed design and construction consideration. At each stage in the options appraisal process, transparent methods were used to inform decision-making. This included technical inputs from engineers, planners and environmental consultants to inform the decisions and design. The optioneering process drew on data and evidence collected from both desk

[1] National Grid (2012) *Our Approach to Options Appraisal*

[2] National Grid (2022) *Our Approach to Consenting*

Matters	Applicant Response
	studies and field work (including technical, environmental, socio-economic, and cost factors). Decision making also took account of feedback from both prescribed bodies and the local community through a programme of engagement and consultation. In addition, the appraisal was subject to challenge and review to ensure the robustness of the decisions made in light of changing circumstances. The Applicant's overarching design principles are set out in the **7.15 Design and Access Statement [REP2-020]**. Good design of electricity transmission infrastructure is primarily governed by application of the Holford and Horlock Rules, alongside an iterative design approach informed by stakeholder engagement, relevant sections of national policy (NPSs EN-1 and EN-5) and the embedded environmental design mitigation as part of the EIA process. Such good design principles are then intertwined with the technical design requirements alongside the regulatory and other constraints such as operational, safety and security requirements for new electricity transmission infrastructure. The design for the Project is set out in detail in **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]** which describes the design submitted within the application. This should be read alongside **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]**, which documents the key environmental factors that were considered in the optioneering and design evolution process (from strategic options to the proposal subject to the application for development consent) and summarises the design process captured in the following reports: • 7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356] • 7.19 2023 - Strategic Options Backcheck and Review [APP-357] • 7.20 2023 - Design Development Report for the Project [APP-358] • 7.21 2024 - Design Development Report for the Project [APP-359] • 7.17 Strategic Options Backcheck and Review [APP-355] • 5.15 Design Development Report [APP-122] • 7.15 Design and Access Statement [REP2-020] • 7.16 Design Approach for Site Specific Infrastructure (DASSI) [Revision B]. The Design Development Reports have been prepared to explain the reasons for taking forward certain changes and explaining why other changes are not taken forwards. Professional judgement was used to determine which changes are judged to be the main ones covered with the remainder covered within the **5.1 Consultation Report [APP-066]**. The Applicant has given due consideration to the costs and benefits of feasible alternatives to the overhead line in line with paragraph 2.9.14 of NPS EN-5. Furthermore, the Applicant has continued to backcheck and review its proposal. After taking into consideration the socio-economic, environmental, technical and cost factors, the proposal that best meets the needs case set out above is an onshore reinforcement between Norwich Main Substation and Tilbury Substation via Bramford Substation, a new Tilbury North Substation. It is concluded in **5.6 Planning Statement [APP-085]**, **7.15 Design and Access Statement [REP2-020]** and **7.16 DASSI [Revision B]** that the Project satisfies the good design criteria identified within Overarching NPS for Energy (EN-1) (2024) and NPS for Electricity Networks Infrastructure (EN-5) (2024). The DAS and DASSI both demonstrate how the Planning Inspectorate's Advice on Good Design[3] and National Infrastructure Commission (NIC) Design Principles for National Infrastructure[4] have been given due regard during the development of the Project. *Design Review* **7.15 Design and Access Statement [REP2-020]**, **7.16 DASSI [Revision B]** and the Environmental Statement demonstrate how the Applicant has taken into account the criteria for good design contained primarily within Advice on Good Design, NIC Design Guidance, and NPS EN-1 and EN-5.

[3] Planning Inspectorate (2024) *Nationally Significant Infrastructure Projects: Advice on Good Design*

[4] National Infrastructure Commission (2020) *Design Principles for National Infrastructure*

Matters	Applicant Response
	The design development of the Project commenced prior to the publication of the Advice on Good Design (published by the Planning Inspectorate) and the introduction of design champions and design principles taking into account the Design Principles for National Infrastructure (published by the National Infrastructure Commission) that is now referred to within footnote 102 in NPS EN-1 (2024) as recommended guidance. As such, the design of the Project was not shaped by the above guidance from the outset. However, the Applicant has demonstrated in 7.15 Design and Access Statement [REP2-020] how the Project design aligns with the principles and expectations set out in the Advice on Good Design and NIC Design Guidance. This assessment ensures design can be understood in relation to the most current Planning Inspectorate Advice on Good Design and NIC Design Guidance. The Applicant has set out a response to Design Evolution from the Project outset in the above row and refers to Section 6 Project Evolution and Design in 5.6 **Planning Statement [APP-085]**. An Internal Design Review was undertaken prior to the submission of the application for development consent. This is reported in Appendix B of the **7.15 Design and Access Statement [REP2-020]**. The Internal Design Review concluded that the Project meets good design through the Development Consent Order (DCO) application process by: 1. Justifying the needs case for an onshore reinforcement between Norwich Main Substation and Tilbury Substation via Bramford Substation, a new East Anglia Connection Node (EACN) substation and a new Tilbury North Substation 2. The Project follows relevant design guidance, including NPS EN-1, and EN-5, NIC Design Principles and the Holford and Horlock Rules 3. The routeing of the transmission corridor and the siting of the site-specific infrastructure has been optimised from the outset through the strategic optioneering process, to balance function and aesthetics, minimising environmental and landscape and visual impact, as documented in the **7.17 Strategic Options Backcheck and Review [APP-355]** 4. Environmental Appraisal has been an integral part of the Project design from the outset, which has meant that the Project was able to avoid environmentally sensitive features as far as reasonably practicable, as set out in the comprehensive Environmental Statement, including a Residential Visual Amenity Assessment, over and above the Landscape and Visual Impact Assessment. The EIA process has embedded measures into the design of the Project to avoid or reduce significant effects that may otherwise be experienced during construction and operation (and maintenance), such as underground cabling through Dedham Vale National Landscape, and a commitment to a minimum of 10% Biodiversity Net Gain. Landscape and visual mitigation and ecological proposals are incorporated into the Landscape and Ecological Management Plan. 5. To support good design the Project has been developed through an iterative process, influenced by extensive stakeholder engagement with Local Planning Authorities and other stakeholders and consultees. The **5.1 Consultation Report [APP-066]** details the Project engagement. The **7.15 Design and Access Statement [REP2-020]** and the **5.15 Design Development Report [APP-122]** set out the changes that have been accepted and those that were considered as result of consultation but rejected for one or more technical reasons, including siting and routeing alternatives considered 6. The Project secures appropriate Limits of Deviation proportionate to the design of the transmission infrastructure, landscape and environmental sensitivity, and the anticipated construction process 7. The **7.2 Outline Code of Construction Practice [Revision D]** will secure design standards and measures that will be implemented during the construction process and operation to ensure a consistent and effective approach to managing potential environmental impacts.
Key observations are outlined below: The Applicant only consulted on and progressed one design option, despite other valid alternatives being available. The planning system allows more than one option to be kept open at the DCO application stages and, if necessary, at the consent stages. Alternative	In response to the planning system allows more than one option, the Applicant refers to Section 4.3 of NPS EN-1 (2024). The alternatives considered and the reasons for them being discounted are reported in 7.17 Strategic Options Backcheck and Review [APP 355], 6.3 Environmental Statement Chapter 3 - Alternatives [APP-

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technologies that deserved full consideration include offshore and underground HVDC options and the use of cable ploughing.	127] and 5.15 Design Development Report [APP-122]. NPS EN-1 makes it clear, in paragraph 4.3.22, that 'the consideration of alternatives in order to comply with policy requirements should be carried out in a proportionate manner; and only alternatives that can meet the objectives of the proposed development need to be considered'. Paragraph 4.3.23 of NPS EN-1 states, 'The Secretary of State should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security, climate change, and other environmental benefits) in the same timescale as the proposed development.' The Project stands to be evaluated on its own merits against the relevant planning policies and not against alternatives that others may prefer, as supported by NPS EN-1 paragraphs 4.3.22 to 4.3.24 to meet the Need Case requirement. The Planning Act 2008 and s50 Statutory Guidance have been produced to guide applicants on the extent and nature of the pre-application process required in relation to linear, nationally significant electricity proposals. Taken together, the provisions of the 2008 Act and the Statutory Guidance do not require formal pre-application consultation (much less consultation on an equal basis) on projects or alternatives which are not the "proposed development". That would be wholly disproportionate and inconsistent with the aim of the 2008 regime which was to speed up and streamline the delivery of nationally important infrastructure. The Examining Authority is referred to the opinion of Russell Harris KC at [APP-080] especially 22-64 for the detail. The Applicant's approach and design is in accordance with policy and law. We also refer to the adequacy of consultation topic which has already been considered by the Examining Authority.
The benefits of offshore coordination in reducing environmental impacts, social and local impacts and cost have been widely known since 2011, and this is highlighted in the National Policy Statements for Energy. Despite this there is no offshore coordination on this project.	The Applicant is required to develop proposals in line with national policy and its regulatory duties. **5.15 Design Development Report [APP-122]** paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines, which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. **5.15 Design Development Report [APP-122]** paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons, are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. The Applicant considered alternatives in **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**, with all onshore alternatives of alternating current (AC) overhead line, AC cable, AC gas insulated line and high voltage direct current (HVDC) options, and offshore options of AC subsea cables and HVDC alternatives. As set out in Table 2.1 of **8.5.4 Applicant's Response to the Open Floor Hearings [REP1-140]** in all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. As set out in **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** Chapter 15 Strategic options appraisal conclusions, the total capital cost for overhead line options EAN 4 and EAS 2 would be £895m whilst for the HVDC offshore 1 option the total capital cost would be £4,096.5m (2020/21 price base). Even with cable sections identified to provide appropriate mitigation, costs remain below half that of HVDC alternatives with the less technical advantages. Technical issues with the HVDC alternatives include the lack of commercially available HVDC circuit breakers. Without HVDC circuit breakers, offshore grids cannot connect large networks together with power generation infeed above 1,800 MW as set out in the Security and Quality of Supply Standards. This is because a fault on a highly interconnected HVDC grid without an HVDC circuit breaker, would cause the whole HVDC network to shut down under fault. Losing more than 1,800 MW of power on the National Electricity Transmission System would cause a significant frequency deviation on the grid, which could lead to a national loss of the system. This currently limits the interconnectivity and size of HVDC systems.
The Applicant has shown disregard to the Holford and Horlock Rules, which are the key design guidelines in National Policy Statement EN-5 for the routing of new overhead lines and for the design and siting of substations	The Holford and Horlock Rules seek to reduce any adverse impacts associated with new overhead lines and substations through the adoption of a series of 'common sense' principles. The seven Holford Rules and supplementary notes and Horlock Rules are identified in Chapter 5 of **7.15 Design and Access Statement [REP2-020]**. They seek to inform routeing and siting decisions by guiding infrastructure away

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	from areas of the highest amenity value. They also encourage particular design outcomes though it is clear from the caveats within the wording of different rules that balanced decision making judgements are required on a case-by-case basis. Depending on the element or elements being positioned this may be informed by the circumstances of different locations, how they may relate to each other and to other elements. The application of the Holford and Horlock Rules typically involves balancing alternative solutions which can present conflicting rule compliance. For example, routeing over relatively high ground rather than in an adjacent valley may conflict with Holford Rules 4 and 5 but may be appropriate if the valley contains extensive areas of unavoidable ancient woodland, effects on which would conflict with Holford Rule 2. Throughout the routeing and siting, the application of the rules required a careful balance of the competing constraints and the opportunities to identify what, on balance of the relevant factors, is the preferred solution.
The Applicant has not used the HMT Green Book “Enabling a Natural Capital Approach” methodology referenced in the National Policy Statements for Energy. This is vital for evaluating options to achieve best outcomes.	As reported in 8.4.1 Applicant’s comments on Relevant Representations [REP2-023]the Applicant is confident that the process we follow to identify and then assess potential strategic options is robust and the most appropriate. This has been tried and tested through numerous previous projects, the formal Examination process and ultimately decided by the relevant Secretary of State. The Treasury Green Book provides guidance on the interpretation by public servants of public spending, assets and resources for projects, policies and spend from the public purse. That is not relevant for National Grid Electricity Transmission (NGET). There is no requirement in the Planning Act 2008 for developers to have to submit a Treasury Green Book assessment as part of a Development Consent Order application. NGET is an Ofgem regulated business, with obligations to consider customer, environmental and other considerations as outlined in the Electricity Act 1989 and in its licence commitments. Consideration of the costs of a project and the funding it should receive via the regulatory settlement is the subject of a separate regulatory process, and it is not appropriate for the Planning Inspectorate, Examining Authority or the Secretary of State in their remit under the Planning Act 2008 to seek to duplicate other regimes.
Due to the interaction with other projects, the additional complexity that the Norwich to Tilbury project would bring is difficult to imagine and probably unprecedented for the region. The interaction applies to projects that are both related and unrelated to this development. It is far from clear that this has been properly addressed by the Applicant and there is a lack of awareness of the potential cumulative impact in affected communities. These considerations are fundamental when assessing how the current proposal would compare with other alternatives, such as offshore or underground HVDC.	The cumulative effects assessment follows Planning Inspectorate’s Advice Note 17 ‘Cumulative Effects Assessment’[5] and is presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281**], as updated at Deadline 4 by **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update**. The Cumulative Effects chapter has assessed the potential intra-project cumulative effects and inter-project cumulative effects. The detailed assessment of the Project with other developments can be found in **6.17.A3 Appendix 17.3 – Inter-Project Cumulative Effects [APP-284]**. The assessment of clusters of other developments on common receptors can be found in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**.
Contrary to the guidance issued by the National Infrastructure Commission in 2020, and the resulting advice being referenced in subsequent National Policy Statements for Energy, the Applicant did not assign a design champion or arrange for independent design reviews to be held throughout the project development stages. Ignoring such key guidance excludes vital sources of external input and impartiality from the design process.	National Grid has extensive experience in the design, siting, engineering and delivery of the type of electricity transmission infrastructure proposed. It also has established internal design governance processes covering transmission design, landscape integration, environmental mitigation and delivery. The Great Grid Partnership enterprise delivery model also has a clear vision to drive sustainability outcomes. It is noted that there is not a mandatory requirement to appoint an independent design review panel for Nationally Significant Infrastructure Projects. Policy and guidance identify a range of mechanisms through which good design outcomes may be achieved. Independent design review is one such mechanism, but not a requirement. The Applicant has demonstrated a clear and sustained commitment to achieving good design in accordance with National Policy Statement (NPS) EN-1 (2024), particularly Section 4.7, and NPS EN-5 (2024), which recognise that the form and appearance of electricity transmission infrastructure are heavily influenced by functional, safety and security requirements, with opportunities for good design primarily arising through routeing, siting, landscape integration and mitigation.

[5] Planning Inspectorate (2024) *Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment*

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As design reviews inform the design as it is progressed, they need to take place from the start of the design process and then at appropriate stages. They serve little purpose if only added at the end.	As noted above, National Grid has extensive experience in the design, siting, engineering and delivery of the type of electricity transmission infrastructure proposed. It also has established internal design governance processes covering transmission design, landscape integration, environmental mitigation and delivery. The Applicant has demonstrated a clear and sustained commitment to achieving good design in accordance with National Policy Statement (NPS) EN-1 (2024), particularly Section 4.7, and NPS EN-5 (2024), which recognise that the form and appearance of electricity transmission infrastructure are heavily influenced by functional, safety and security requirements, with opportunities for good design primarily arising through routeing, siting, landscape integration and mitigation. The Applicant can confirm that post-consent design reviews will be overseen through the Applicant's established governance structures, including the Delivery and Detail Design Champion, rather than through a separate independent design review panel. Paragraph 4.7.2 of NPS EN-1 states: '*Applying good design to energy projects should produce sustainable infrastructure sensitive to place … efficient in the use of natural resources … and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible'*. This can all be achieved through the appointment of Design Champion and post-consent design reviews.
Two examples are provided where the National Infrastructure Commission guidance has been applied in another sectors. Like the Norwich to Tilbury project, the examples selected apply to the design of linear infrastructure projects where the developers are statutory undertakers.	The Applicant notes the summary of design reviews undertaken by National Highways and Network Rail provided in Appendix C-1 and C-2 of their submission. Independent design review panels for Nationally Significant Infrastructure Projects are not a mandatory requirement. Guidance (including the Planning Inspectorate's Advice on Good Design[6]) identify a range of mechanisms through which good design outcomes may be achieved. Independent design review is one such mechanism, but not a requirement, and the choice of mechanism should be proportionate to the type of infrastructure and the scope for design influence. Chapter 3 of the **7.15 Design and Access Statement [REP2-020]** sets out that the design development of the Project commenced prior to the publication of the Advice on Good Design and reference now made to National Infrastructure Commission (NIC) Design Guidance[7] in NPS EN-1 (2024). Therefore, the Project design was not shaped by it from the outset. The **7.15 Design and Access Statement [REP2-020]** demonstrates how the design aligns with the principles and expectations set out in the Advice on Good Design and NIC Design Guidance. As outlined in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**, should consent for the Project be forthcoming, post-consent design reviews will be overseen through the Applicant's established governance structures, including the Delivery and Detail Design Champion (DDDC). The Applicant has appointed a Development Design Champion (DDC) from within National Grid's existing design governance structure. The role of the DDC is to ensure a consistent design language in line with National Policy Statement (NPS) EN-1 (2024), NPS EN-5 (2024), the Holford and Horlock Rules, and other relevant guidance will be followed through in post-consent decisions. National Grid has extensive experience in the design, siting, engineering and delivery of the type of electricity transmission infrastructure proposed. It also has established internal design governance processes covering transmission design, landscape integration, environmental mitigation and delivery. The Great Grid Partnership enterprise delivery model also has a clear vision to drive sustainability outcomes. The DDC, while an internal appointment, is independent of the day-to-day project delivery functions that fall under the remit of the DDDC. The DDC therefore provides a structured and impartial design-challenge function consistent with the Planning Inspectorate's Advice on Good Design.

[6] Planning Inspectorate (2024) *Nationally Significant Infrastructure Projects: Advice on Good Design*

[7] National Infrastructure Commission (2020) *Design Principles for National Infrastructure*

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For a project of this scale and nature, it is essential that best practice is employed in all areas. The issues highlighted in this document show this was not the case for the proposed Norwich to Tilbury project.	As set out in **7.15 Design and Access Statement [REP2-020]** the Applicant's position is that through the application of the Holford Rules and Horlock Rules and the undergrounding policy, we are able to demonstrate that the principles of good design have been applied in the design of the Project. It is concluded in **7.15 Design and Access Statement [REP2-020]** and **7.16 Design Approach for Site Specific Infrastructure (DASSI) [Revision B]** that the Project satisfies the good design criteria identified within Overarching National Policy Statement (NPS) for Energy (EN-1) (2024) and NPS for Electricity Networks Infrastructure (EN-5) (2024). The **7.15 Design and Access Statement [REP2-020]** and **7.16 DASSI [Revision B]** both demonstrate how the Planning Inspectorate's Advice on Good Design[8] and National Infrastructure Commission Design Principles for National Infrastructure[9] have been given due regard during the development of the Project.
2. Pylons East Anglia's Position The Pylons East Anglia campaign group (also known as ESNP) was formed when the Norwich to Tilbury project was first announced in 2022. The group was born out of concerns relating to the harm to communities and the environment that the project would cause and that, in essence, the only option being presented was an onshore HVAC pylons-based solution. The project was initially named by National Grid as "East Anglia Green Energy Enablement (GREEN)". In the NGET April 2022 Community newsletter1, under the heading "Why is East Anglia GREEN needed?" the following was stated: "… With new offshore wind generation, a new nuclear power station at Sizewell C and greater interconnection with countries across the North Sea being proposed, there will be a huge increase in the amount of renewable and low carbon electricity generation connecting along the East coast." With the emphasis in the stated need on connecting offshore wind generation, a coastal nuclear power station and incorporating North Sea interconnections it was questioned why the proximity to the coast was not being utilised and the power instead delivered directly to Tilbury, or indeed other locations closer to demand, via offshore cables. It also became clear that the project would have a huge cumulative impact on the region due to the very significant impact from associated projects and the fact that there was already a 400kV overhead line running from Norwich to Tilbury. In relation to the latter, there are for instance locations along the route where people currently living with a view of 400kV line on one side of their property would be faced with a similar view on the other side of their property. The group also became aware of a key study by ESO (now NESO) from 20202 demonstrating the significant benefits that result from offshore integration. The economic appraisal methodology used in the study was based on HM Treasury Green Book guidelines. The report showed that the benefits were particularly pronounced in relation to environmental impacts, social and local impacts and cost. These are illustrated in the following diagram from the report "Figure 0-1 Summary of valuation results for quantitative KPIs".[*See submission for image*] In its summary of the report ESO state that in addition to significant savings in capital and operating expenditure "There are also significant environmental and social benefits with an integrated approach, as the number of new electricity infrastructure assets, including cables and onshore landing points, could be reduced by around 50 per cent"3. It is important to note that the Pylons East Anglia campaign group is not objecting to decarbonising the electricity grid in the region. The fundamental principle is that this must be executed in the least harmful way. To achieve this, alternatives must be fully explored and proper consideration given to the environment and communities by using best practice tools and processes in all areas.	The Applicant acknowledges the summary of the Pylons East Anglia position on the Project in which it is fundamentally considered that further considerations of alternatives, particularly offshore alternatives, is required. The Applicant has responded to Pylons East Anglia and other Interested Parties on this point in several submissions during Examination thus far, and through discussion at Issue Specific Hearing 1 (ISH1) on 13 February 2026. The Applicant maintains its position that alternatives – both onshore and offshore – have been sufficiently considered in the development of the Project and that the Project as proposed is compliant with national policy. Please refer to the following submissions for further information: • 8.4.6 Applicant's comments on submissions received at Procedural Deadline A [REP1-136], Table 3.1 • 8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139], Table 2.2 and page 30 • 8.4.8 Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [REP3-070], page 196 and pages 207 to 210 • 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030], Section 3.3.

[8] Planning Inspectorate (2024) *Nationally Significant Infrastructure Projects: Advice on Good Design*

[9] National Infrastructure Commission (2020) *Design Principles for National Infrastructure*

3. The Requirement for Good Design

3.1. The Planning Act 2008 places great importance on the need for "good design". Good design is also embodied within many of the requirements in the National Policy Statements for Energy.

3.2. A search using the term "good design" shows that it is used 22 times in EN-1 and 9 times in EN-5, in both the 2023 and 2025 versions, plus there are many less direct references.

3.3. Guidance on achieving good design has been provided by the Planning Inspectorate in the form of webinars and various documents.

3.4. The Overarching National Policy Statement for Energy, EN-1, states in Section 4.7.2 (2023 and 2025) that: "Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however that the nature of energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area".

3.5. And from Section 4.7.3: "Good design is also a means by which many policy objectives in the NPSs can be met, for example the impact sections show how good design, in terms of siting and use of appropriate technologies, can help mitigate adverse impacts such as noise…".

3.6. Both the 2023 and 2025 versions of the Overarching National Policy Statement for Energy (EN-1) refer to the Design Principles for National Infrastructure published by the National Infrastructure Commission (NIC)4.

3.7. The NIC report, which was published in February 2020, established four key principles "climate, people, place, and value" to guide the design of major infrastructure projects in the UK. The report's introduction states: "We are moving into a decade where many big infrastructure projects will begin. Their legacy will be defined by the quality of their design. We owe it to present and future generations to make them the best they can be. These principles are here to show the way".

3.8. The report then goes on to state: "The Assessment's recommendations are the start for improving the quality of design of national infrastructure. Design champions and design panels will take forward the spirit of the design principles. They will push for designs that create great places, respond to what people need and want, mitigate society's climate impact and provide good value. They will do this by appreciating the wider context, engaging meaningfully and continually measuring and improving".

3.9. Advice from the NIC report is embedded in the Planning Inspectorate webinar: "Achieving good design in Nationally Significant Infrastructure Projects". The slides from the webinar highlight that the "(relevant) Secretary of State" [has a] "Statutory duty to achieve good design"6.

Policy Context for Good Design

Section 4.7 of National Policy Statement (NPS) EN-1 (2024) states that good design should ensure functionality, sustainability, and aesthetic quality. Paragraph 4.7.1 of EN-1 is particularly relevant, stating that: '*The visual appearance of a building, structure, or piece of infrastructure, and how it relates to the landscape it sits within, is sometimes considered to be the most important factor in good design. But high quality and inclusive design goes far beyond aesthetic considerations. The functionality of an object – be it a building or other type of infrastructure – including fitness for purpose and sustainability, is equally important*.'

Paragraph 4.7.2 of NPS EN-1 states: '*Applying good design to energy projects should produce sustainable infrastructure sensitive to place … efficient in the use of natural resources … and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible'*. The NPS EN-1 recognises (paragraph 4.7.6) that there may be limited choice in physical appearance of energy infrastructure, but there could be opportunities to demonstrate good design in terms of siting. It also suggests that functionality (fitness for purpose and sustainability) and aesthetics should be considered (paragraph 4.7.10).

NPS EN-5 expands on the above setting out at paragraph 2.4.3 that (our emphasis) '…*the Secretary of State should bear in mind that electricity networks infrastructure must in the first instance be* ***safe and secure****, and that the functional design constraints of safety and security may limit an applicant's ability to influence the aesthetic appearance of that infrastructure*.'

NPS EN-5 makes it clear that the government considers overhead lines should be the 'strong starting presumption for electricity networks developments in general', although 'this presumption is reversed when developments will cross part of a nationally designated landscape' (paragraph 2.9.20). It is also noted that EN-5 identifies that there may also be instances outside the nationally designated landscapes, where 'a high potential for widespread and significant adverse landscape and/or visual impacts' (paragraph 2.9.23) may result in the use of underground cables in certain sections.

The Planning Inspectorate's Advice on Good Design10 was published in October 2024; whilst not part of legislation it gives advice that explains why good design is important, what success might look like and how it might be delivered in Nationally Significant Infrastructure Project applications. As such the Advice on Good Design is considered to be a relevant consideration in the determination of the application for development consent.

While the design development of the Project commenced prior to the publication of this "guidance" and was therefore not shaped by it from the outset, the 7.15 Design and Access Statement [REP2-020] utilises the principles within the Advice on Good Design and demonstrates how the evolving design nonetheless aligned with the principles and expectations set out in the advice note. This assessment ensures design can be understood in relation to the most current Planning Inspectorate advice on good design, adopting the four principles below:

- Assemble: Establish purpose, team, and baseline data
- Research: Analyse constraints, alternatives, and stakeholder feedback
- Coordinate: Refine design based on technical feasibility and consultation
- Secure: Embed design commitments in the Development Consent Order (DCO) and appoint a Design Champion to oversee post-consent design integrity.

An assessment of the Project's design evolution against these principles is set out in 7.15 Design and Access Statement [REP2-020].

Similarly to the Advice on Good Design, the Design Principles for National Infrastructure11 have been given due regard during the development of the Project and this is demonstrated within **7.15 Design and Access Statement [REP2-020]**.

The Project has sought to demonstrate a commitment to achieving Good Design throughout the project lifecycle.

Going forward into the post-consent stage the Project will continue to be substantially in accordance with NPS EN-1, EN-5, NIC Design Principles, and Planning Inspectorate Advice on Good Design, through a number of proactive measures:

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	• Design Champion/s – The Applicant has already appointed a Design Champion to support the DCO process, and will appoint a further Design Champion to support the continued adherence to Good Design through the detailed design development, tendering and construction phases. The Applicant will set out these roles and proposed governance as part of their commitment to achieving Good Design • Independent Design Review (IDR) – Given the level of Good Design rigor already applied throughout the Project the Applicant does not consider that IDR will bring any additional benefit to the commitments already demonstrated • Adherence to Approved Design Principles – All detailed designs submitted for discharge of DCO requirements will be 'substantially in accordance' with the approved Design Principles, DAS and DASSI • Landscape and Visual Integration – Continue to develop landscape and visual integration through detailed design and construction The Applicant confirms that post-consent design reviews will be managed through the Applicant's established governance arrangements led by the Great Grid Partnership, including the involvement of the Delivery and Detail Design Champion (DDDC), rather than via a separate independent design review panel. In addition, for the part of the project around the EACN substation, the Applicant has set out design parameters within the DASSI that are consistent with, and aligned to, the emerging North Falls and Five Estuaries Offshore Wind Farms Joint Substations Design Guide (JSDG), which itself is subject to independent design review. This approach ensures design compatibility and avoids potential conflicts between the projects. More details can be found in **8.9.1 Applicant's Responses to First Written Questions [REP3-074], DES 1.3**
4. The Norwich to Tilbury Project 4.1. Consideration and Evaluation of Alternatives 4.1.1. From the outset the Applicant showed commitment to a single option for the Norwich to Tilbury project, based on a new 400kV overhead line with limited underground sections. This is recorded in the Inception Meeting held with the Planning Inspectorate on 4 April 20227. The appropriate section from the meeting notes is copied below:*[See submission for extract]* 4.1.2. It is noted that at the Inception Meeting the Planning Inspectorate advised that birds and flight paths "would be an important consideration". 4.1.3. Commitment to this option remained throughout the pre-application stage to form the basis of the DCO application. The proposal recorded in the Applicant's DCO document "**5.6 Planning Statement (Final Issue A) [APP-085],** dated August 2025"8 is based on a new 400kV overhead line with limited underground sections, as shown in the section from the document copied below: *:[See submission for extract]* 4.1.4. Early opposition to the proposed scheme and preference for an offshore alternative were acknowledged by the Applicant. This was, for example, recorded at a meeting with the Planning Inspectorate on 4 July 2022: "The Applicant has seen opposition to new onshore overhead power lines through consultation feedback. Local people have raised concerns about the visual impact of pylons, property values and diminished ability to sell in the future. Further concerns about health issues of overhead lines and mental health due to stress during development were raised. Many consultees believe that the infrastructure should go in the sea…"9	The objectives of the Project are manifold and are set by statute, National Policy Statements (NPSs), statutory guidance and ministerial and other guidance. In short, the Project seeks to meet the identified urgent need for critical national priority infrastructure in East Anglia. At each stage of consultation, the Applicant has laid out our consideration of the alternative route options and technologies. The Applicant's consideration of alternatives is set out in **7.19 2023 - Strategic Options Backcheck and Review [APP-357],** with all onshore alternatives of alternating current (AC) overhead line, AC cable, AC gas insulated line and high voltage direct current (HVDC) options, and offshore options of AC subsea cables and HVDC alternatives. The Applicant's role is to carefully consider the most feasible options and present proposals for public consultation. We cannot present plans for consultation that would not meet the requirements placed on us by the government and our regulator Ofgem. The proposals that the Applicant has chosen to consult on and develop are the ones which meet our statutory duties, including the duties imposed on us by national policy (NPS EN-1 (2024) and NPS EN-5 (2024)). As reported in the **7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]** at the 2022 non-statutory consultation, the Applicant presented information on how the Project was evolving from the evaluation of strategic options to a preliminary preferred graduated swathe within which new infrastructure (pylons and underground cables) could be located as well as a proposed new substation site on the Tendring Peninsula. Following the conclusion of this consultation, the Applicant analysed the feedback received, and along with further technical studies and design work, developed the Project design ahead of the 2023 non-statutory consultation. At the 2023 non-statutory consultation, the Applicant presented a preferred draft alignment showing indicative pylon positions, routes of underground cables, and potential locations of Cable Sealing End (CSE) compounds and connection

[10] Planning Inspectorate (2024) *Nationally Significant Infrastructure Projects: Advice on Good Design*

[11] National Infrastructure Commission (2020) *Design Principles for National Infrastructure*

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4.1.5. At the same meeting the potential for the proposed scheme to cause a high level of harm was also acknowledged: “The Applicant stated that there are some areas of high sensitivity in the currently proposed route corridor and further work will be done to reduce the impacts where practicable, including the use of appropriate mitigation”. 4.1.6. This statement does not show regard to the mitigation hierarchy. The first stage in the mitigation hierarchy, as outlined in the Glossary of EN-1, is “avoid”. 4.1.7. Even a very high-level assessment would reveal the potential for high levels of harm along the whole route, noting the risk to communities, nature, the valued landscapes (many of which are very flat), important agricultural land and very high value heritage assets such as scheduled monument sites. These issues were raised by consultees. 4.1.8. Noting the concerns, and the fact the prevailing 2011 version of National Policy Statement EN-5 allowed underground and sub-sea alternatives to be considered10, at least one further option should have been added to the consultation process from this point onwards. 4.1.9. Alternative technologies that deserved full consideration include offshore and underground HVDC options. 4.1.10. In relation to offshore solutions, Section 4.2 of this report outlines the significant benefits that can arise from offshore coordination. 4.1.11. The use of cable ploughing as an installation techniques for underground cables is also very relevant as it provides a method that is quicker, cheaper and less damaging than open trenching. When used with HVDC technology, which requires significantly less cables, the benefits are compounded. 4.1.12. The need to “avoid” nationally designated landscapes was further emphasised in the 2023 version of EN-511. This is very relevant, as the Applicant’s proposal crosses the Dedham Vale National Landscape. 4.1.13. Should it not be possible to “avoid” the National Landscape, and indeed the other areas with high amenity value, the second stage of the mitigation hierarchy applies which is to “reduce”. Underground HVDC would for example cause much less harm than the proposed underground HVAC, due to the requirement for 6 cables instead of 18. It is only when all options have been fully exhausted that the “mitigate” stage of the mitigation hierarchy should be applied. 4.1.14. The strength of feeling in the region that the Applicant’s proposed scheme is the most harmful solution is indicated in part by over 40,000 people signing a petition to “SAY NO TO 180km of Essex Suffolk Norfolk pylons - and build a strategic offshore grid instead”. The number of signatories is therefore close to the 2022 non-statutory consultation mail-out of 50,00013 (which was increased to approximately 75,000 for the statutory consultation). There are also over 7,000 members in the campaign Facebook Group. 4.1.15. Reports submitted by Pylons East Anglia in relation to the statutory and non-statutory consultations highlight that the Applicant was not receptive to other alternatives. The paragraph below *:[See submission for extract]* from the Pylons East Anglia report on the 2023 Norwich to Tilbury non-statutory consultation relates the experiences to the findings from an academic study on the Applicant’s Hinkley Connection project. 4.1.16. Planning Inspectorate guidance “Nationally Significant Infrastructure Projects: Advice on Preparing Applications for Linear Projects”16 outlines how options can be kept open within DCOs at the application and consent stages. This can allow for example “flexibility for future commercial delivery alternatives or technological advancement”. The example mentions options for “routeing” and “…high voltage alternating current (HVAC) or high voltage direct current (HVDC)…”. 4.1.17. Under the heading “DCO drafting which includes options”, it states: “Examples include: Hinkley Point C Connection which had two versions of the DCO depending on whether route	substations. The feedback received at this consultation was considered alongside the findings of the Applicant’s ongoing environmental assessments and technical studies to help identify the proposals presented at statutory consultation. At the 2024 statutory consultation, the Applicant presented a preferred draft alignment showing indicative pylon positions, routes of underground cables, new CSE compound locations and new connection substations. The feedback received at this consultation was considered alongside the findings of environmental and engineering studies to help identify the proposals presented at targeted consultation. The Applicant has carefully considered the feedback proposing the use of underground cable along the route, the alternatives available, and other relevant considerations. These include our duties and obligations under various legislation encompassing consideration of cost, environment, socio-economic and engineering factors. Alternatives have been fully considered throughout development. The Project has been designed in line with NPS EN-5, which sets a strong starting presumption in favour of overhead lines for new electricity transmission infrastructure. This strong starting presumption remains even when there is a high likelihood of significant impact and is only reversed for nationally designated landscapes. Except in nationally designated landscapes, underground or offshore alternatives are only preferred when their benefits outweigh any extra economic, social, or environmental impacts. Environmental appraisal was an integral part of the Project design from the outset, which has meant that the Project was able to avoid environmentally sensitive features as far as reasonably practicable. Through this process the Applicant has applied the mitigation hierarchy (sequentially considering the use of measures at increasing levels of cost) until an acceptable design consistent with relevant policy is achieved. This has also embedded measures into the design of the Project to avoid or reduce significant effects that may otherwise be experienced during construction and operation (and maintenance) of the Project. Embedded measures are those that are intrinsic to and built into the design of the Project. These are set out in the **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**, where examples include: • Sensitive routeing and siting of the alignment and Order Limits – as far as practicable, effects on identified environmental (including landscape and visual, ecology and heritage assets) and socio-economics receptors have been avoided and reduced • Underground cabling of the route in four locations, including through Dedham Vale National Landscape, where the effects on views and setting would be reduced. Further information about undergrounding is provided in the **5.15 Design Development Report [APP-122]** and **5.1 Consultation Report [APP-066]** • Pylon options have been explored and designs selected to optimise the balance between function, aesthetics, minimising environmental impact, (including landscape and visual) and cost. This is evidenced in the information about routeing and decision making presented in 7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356] (CPRSS) and 7.18 Errata 2022 - Corridor and Preliminary Routeing and Siting Study Appendices [REP1-068] published in 2022, the Design Development Reports (DDRs) published as part of the 2023 non-statutory consultation (7.20 2023 - Design Development Report for the Project [APP-358]), the 2024 statutory consultation (7.21 2024 - Design Development Report for the Project [APP-359]) and with the application for development consent (5.15 Design Development Report [APP-122]). When defining and appraising strategic options, the Applicant followed a systematic approach to routeing and siting. This has included consideration of National Grid’s statutory duties, the Holford and Horlock Rules and national policy. Addressing the specific comment regarding avoiding the National Landscape, as described in **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]** the Project routeing at the Strategic Options Stage of the assessment focused on whether the Bramford to EACN substation connection should route directly through the Dedham Vale National Landscape (using underground cables within the National Landscape) or take a longer route around it via the Twinstead Tee area. A decision was taken by the Applicant to adopt underground technology through a more westerly part of the Dedham Vale National Landscape, achieving greater separation from sensitive ecology receptors and from areas of particular focus for National Landscape visitors.

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option A or B went ahead Norfolk Boreas Offshore Windfarm (OWF) contained optionality within one DCO for whether it would be developed alone or alongside another OWF Hornsea Project Three left the decision over HVAC or HVDC or a combination of both, to be made post-consent by the undertaker. Works for both were contained in the DCO, including a requirement to explain the choice to the relevant planning authority…"	Routes avoiding the National Landscape by passing north of Colchester presented significant additional challenges, including greater technical complexity with multiple constrained sections at Layham, Boxford, and Lamarsh Lane, increased construction complexity, and the need for additional crossings of existing infrastructure such as the proposed Bramford to Twinstead overhead lines. Moreover, routes north of Colchester may still result in adverse effects on the setting of the National Landscape. The direct route with underground cables was selected as it halves the connection length, avoids creating a third connection between Bramford and Twinstead, and better complies with the Holford Rules, despite requiring underground cable mitigation through the National Landscape. It is considered that permanent detrimental effects on the environment, landscape and recreational opportunities within the National Landscape have been avoided through undergrounding and careful consideration of routeing and siting through the National Landscape. National Policy Statement (NPS) EN-1 (2024) identifies an urgent national need for electricity infrastructure of this nature, which is required in the national interest to be delivered as soon as possible. In terms of the consideration of alternatives the Project has been developed to be consistent with NPS EN-5 (2024) which is clear that the use of overhead lines is the strong starting presumption for electricity networks development. At each stage of the Project a consistent level of information has been used to support decision making between alternatives, leading to the selection of the preferred option. Paragraph 2.9.21 of NPS EN-5 says that overhead line should be the strong starting presumption for electricity network developments in general. That strong starting presumption is reversed, but is only reversed for nationally designated landscapes. It should be noted that routeing through a National Landscape is not in conflict with NPS EN-1 or EN-5. The Applicant has applied the strong starting presumption of overhead lines in the correct places, and it has reversed that presumption in the circumstances of the National Landscape. The Applicant has considered a whole range of different alternatives on the Project, some more theoretical and conceptual, as reported in 7.17 Strategic Options Backcheck and Review [APP-355], 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127] and 5.15 Design Development Report [APP-122]. More localised design variants have also been considered. The Applicant considered the following options, as well as alternating current (AC) overhead lines: • An AC gas insulated line – this uses a tube with an insulator in it and gas surrounding it as the insulation material. No AC gas insulated line has been constructed anywhere in the world above 10 km. It is not a technology that has reached a maturity at transmission level for this proposal • AC underground cables – these require a CSE compound or substation every 20–30 km to have a set of reactors and switching stations to manage technical limitations on the way that cables work and to avoid a collapse of energy within the cable. Therefore, an AC underground cable has to come above the ground and reactors are needed • High voltage direct current (HVDC) cable – this requires a converter station at each end of the cable. The largest converter stations with cables that are being used currently are 2 GW at 520 kV, so to achieve the 6 GW needed on Norwich to Tilbury, three sets of these HVDC systems would be required, with a minimum of three converters at each end of the connection • Economic Appraisal of **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** presents the costs, based on a transparent economic appraisal. The Project design has applied the mitigation hierarchy to minimise residual impacts and the need for the Project strongly outweighs those impacts. The mitigation hierarchy has been applied throughout development of the Project as part of the iterative Environmental Impact Assessment process which has informed the routeing and siting process. The Project has been designed to avoid, reduce, compensate or mitigate potentially significant adverse residual effects. The application for development consent is supported by an Environmental Statement **[APP-123 to APP-298]** which demonstrates that the mitigation hierarchy has been applied throughout the design and development of the Project. NPS EN-5 makes it clear that the government considers overhead lines should be the '*strong starting presumption for electricity networks developments in general*', although '*this presumption is reversed*

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	when developments will cross part of a nationally designated landscape' (paragraph 2.9.20). It is also noted that EN-5 identifies that there may also be instances outside the nationally designated landscapes, where '*a high potential for widespread and significant adverse landscape and/or visual impacts*' (paragraph 2.9.23) may result in the use of underground cables in certain sections. Where the effects arising from standard lattice pylons are considered to be inconsistent with policy and National Grid's duties, the mitigation hierarchy is applied. The mitigation hierarchy sequentially considers localised specific mitigation measures, pylon position and routeing, low height pylons, T-pylons and the use of underground cables. Applied in this way National Grid can demonstrate compliance with its duties under the Electricity Act and be assured the Project will be funded.
4.1.18. The use of either onshore or offshore HVDC technology was dismissed by the Applicant at a very early in the development process and options involving this technology were not consulted on. 4.1.19. The benefits of HDVC are well known and, given the acknowledged constraints with the planned network reinforcement, the ability of the technology to greatly reduce harm is particularly important. 4.1.20. The technical viability of HVDC for Norwich to Tilbury was confirmed by NESO in the East Anglia Network Study17, although the short duration of the study resulted in limited options being explored. 4.1.21. Pylons East Anglia made requests for further options to be investigated, but these were not granted18. 4.1.22. Issues with the availability of HVDC equipment reported by Transmission Owners during the East Anglia Network Study resulted in NESO voicing concerns about delivery delays. Since the study, the Applicant has been very successful in securing supplies of HVDC cable, as reported in National Grid's RIIO-T3 Business Plan19: "In the case of HVDC orders, this has resulted in our supply chain partners investing in a new factory, a new ship and a significant expansion of a UK facility on the back of the long-term order book certainty we have given them." 4.1.23. The Applicant has highlighted supply issues with HVDC circuit breakers. These are not required with point-to-point connections, noting the Applicant's current plans for other HVDC projects such as EGL3, EGL4 and Sea Link. 4.1.24. In contrast the UK has shown leadership elsewhere in HVDC technology. The 2024 report "Multi-terminal HVDC Grid: Current Status and Next Steps"20 was written for the U.S. Department of Energy (DOE) but strongly references UK and other European examples. This includes the Caithness Moray Shetland multi-terminal HVDC system21. 4.1.25. A slide from the report showing "Future developments" is provided in Appendix A. The "Radial multi terminal Europe" project shown for 2023 is the three-terminal radial Caithness Moray Shetland (CMS) multi-terminal HVDC system. This and the "Multi-terminal grids & islands Europe" shown in the diagram are current technologies which make overhead lines look increasingly outmoded and incongruous for a project that is principally transmitting offshore power. 4.1.26. In addition to the developments in HVDC technology, rapid developments in other areas are also very relevant to how the grid should develop. 4.1.27. For example, from recent news reports, on 25 March 2026 Centrica and Ceres announced a partnership "to enable and accelerate deployment of multi-gigawatt, on-site, grid-independent power across the UK and Europe" using a "British-designed low carbon fuel cell solution"22. 4.1.28. And in an interview with The Times on 27 March 2026, Greg Jackson, the Founder and CEO of Octopus Energy argues that the planned UK electricity grid expansion "is based on outdated assumptions" and called for a "a huge rethink". An extract from the interview follows.*[see submission for extract]*	The multi-factor evaluation of all alternative options confirms the same conclusion. **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** Section 5 Options assessment process, pages 47–49, sets out how the Applicant evaluated the options, taking into account the environmental assessment, socio-economic aspects, technical benefits and the capital lifetime costs. This concluded that the need case was met by the onshore alternating current (AC) solution, in line with National Policy Statement (NPS) EN-1 (2024) and the Electricity Act 1989. It also integrates new customer connections within the Norwich to Tilbury project, in line with the transmission and licence obligations. The Applicant has considered a whole range of different alternatives on the Project, some more theoretical and conceptual, as reported in **7.17 Strategic Options Backcheck and Review [APP-355]** Chapter 5 Strategic option overview pages 45–47, **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]** entire chapter, and **5.15 Design Development Report [APP-122]** Section 2 Project-Wide Considerations Relevant to Design Development pages 17–33 and local issues addressed in Section A–H siting and routeing alternatives. More localised design variants have also been considered. Along with the NESO East Anglia Study, the Applicant also considered the following options for onshore and offshore developments, in addition as AC overhead lines: • An AC gas insulated line: this uses a tube with an insulator in it and gas surrounding it as the insulation material. No AC gas insulated line has been constructed anywhere in the world above 10 km in length. It is not a technology that has reached sufficient maturity at transmission level for this proposal • AC underground cables: these require a Cable Sealing End (CSE) compound or substation every 20–30 km to have a set of reactors and switching stations to manage technical limitations in the way that cables work and to avoid a collapse of energy within the cable. Therefore, an AC underground cable has to come above the ground at intervals and reactors are needed • High voltage direct current (HVDC) cable: this requires a converter station at each end of the cable. The largest converter stations with cables that are being used currently are 2 GW at 520 kV, so to achieve the 6 GW needed on Norwich to Tilbury, three sets of these HVDC systems would be required, with a minimum of three converters at each end of the connection. The Applicant also notes constraints in the HVDC market, which are likely to make a HVDC alternative a deliverability risk even if there was a delay of five years. Where the Applicant is currently delivering HVDC projects, it is delivering 2 GW solutions. Norwich to Tilbury would require a 6 GW solution. Not only would there be constraints in delivering the cables, but also in the converter market and the specialist requirements that are needed as part of a HVDC installation, including access to cable-laying ships and equipment to do it. These are under extreme worldwide pressure with a number of companies seeking to use the limited HVDC resources that are available. The Applicant stated clearly that its existing projects EGL1,2,3,4,5 and Sea Link all are installing a single 525 kV 2 GW solution, each requiring two convertors, one at each end and 1 Bi-pole (two sets of cables) each. These projects have already contracted or are seeking to contract into the market, so already consume market capacity in their own right in near term timescales. To provide the capacity required by the Applicant's project, HVDC solutions of 6 GW capacity are required. 525 kV HVDC cable is the highest voltage cable available in the world currently and a bi-pole pair highest capacity is 2 GW, along with the capacity limits for HVDC power electronics at 525 kV.

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	Therefore to deliver a HVDC alternative, the Applicant has consistently stated 3 x 2 GW HVDC link would be required. This requires six HVDC convertor stations, three at each end, and three bi-pole (six cables) to connect to convertors, if the same flexibility is to be achieved in the network as the Applicant's proposals as **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** page 111, paragraph 14.4.6 states: '14.4.6 Should this circuit at full 6000 MW capacity made multiterminal to provide the same system flexibility as the AC circuit options. There would be a need for an additional three sets of HVDC convertor stations and three sets of 50km HVDC cable to connect to Bramford, to make multi-terminal HVDC links. This would add an additional £1,265.1m of capital cost and increase circuit lifetime cost by £1,587m. This would give overall capital costs of £ 5361.1m (£4,096.5m + £1,265.1m), and overall lifetime cost of £6,248m (£4,661m + £1,587m).' This option would require an additional three converters and an additional 150 km of cable. Therefore, even the less optimal solution would be three times the capacity of EGL1 or Sea Link for example, therefore the cable and convertor requirements are significant in the world market where capacity is finite in nature and in high demand worldwide. The Applicant agrees that electrically separate and isolated point to point HVDC Links do not require HVDC circuit breakers. However, the Applicant has always made reference for the need for such circuit breakers to be used on integrated HVDC networks and networks where more than 1,800 MW of generation would be required to connect to the network, as is the case if North Falls, Five Estuaries and Tarchon are required to connect to a HVDC network. The availability of HVDC circuit breakers is another technical limitation at the current time. This restricts any generation connecting to a HVDC network to 1,800 MW because, without the circuit breakers, the whole network would be lost. This would result in widescale transmission system problems and would be a breach of the National Electricity Transmission System Security and Quality of Supply Standards, which is a requirement in the Applicant's licence, Condition D3: Transmission system security standard. The 'Essex Coast Generation Group' subsection in Section 3: Need case, page 34, of **7.17 Strategic Options Backcheck and Review [APP-355]** explains that the Applicant has also contracted connections for new generation and interconnectors located off the Essex Coast: • Five Estuaries Offshore Windfarm (1,080 MW by 2030) • North Falls Offshore Windfarm (1,000 MW by 2030) • Tarchon Energy Limited Interconnector (1,400 MW By 2030) This 3,480 MW of total generation requires connection in the region. The 1,800 MW HVDC infeed ceiling should be measured against the 3,480 MW already contracted from the Essex Coast alone – a figure more than double the 1,800MW generation infeed. This makes the deliverability of an integrated offshore/HVDC alternative with connection of Essex Coast generation not feasible within generation infeed limits, requiring segregation of HVDC systems. With reference to the May 24 DNV report Multi-terminal HVDC Grid: Current Status and Next Steps[12], slides before the 'Future developments' slide set out in the response, set out 'What are the main barriers?': • 'Inadequate cross-jurisdiction coordination – Between states; Between ISOs and non-ISOs; Between countries • Incompatible regulatory frameworks • Insufficient operational and planning experience • Proven protection and control strategy* • Lack of standardization • Unsolved vendor interoperability issues

[12] DNV (2024) *Multi-terminal HVDC Grid: Current Status and Next Steps*

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	• Limited supply chain* • Onshore AC grid constraints*'. Those marked with an asterisk (*) above are consistent with the points the Applicant has made about, supply; protection and control (specifically HVDC circuit breakers where HVDC networks are interconnected or connect generation); and the urgent need to resolve AC grid constraints set out within the **7.17 Strategic Options Backcheck and Review [APP-355]** Section 3 Need case pages 20-38. HVDC circuit breakers have not been used anywhere in the UK or Europe with no manufacturer having yet installed or demonstrated a commercial version. The Applicant is part of a Beta phase innovation project seeking to prove and utilise this technology; however, that project is still in-flight and has not yet yielded the development phase. The Applicant is using 525 kV HVDC technology to achieve ratings it requires for the HVDC connections; the Caithness Moray Shetland project at 320 kV is seeking to be the first multi-terminal HVDC and is running the innovation project on HVDC circuit breakers at 320 kV in Beta phase, although the multi-terminal line would not require HVDC circuit breakers should the innovation project fail, as the amount of generation connected to the Caithness Moray Shetland project is below 1,800 MW. 525 kV circuit breakers would then be a step beyond this phase, so currently in Europe and the UK no HVDC circuit breakers have been used, tested, or demonstrated at any voltage. The National Energy System Operator (NESO) innovation SIF R1 Beta- Network-DC Circuit Breakers Annual Report 202413 makes it clear there have been delays and manufacturer resource is stretched and market incentives are low, but the project has been expecting tenders to start development. The use of bespoke energy solutions to provide different approaches to energy provision for large loads such as Data Centres is already under consideration for deployment for some customers trying to connect to large city load centres and are solving a problem of high demand in such areas, which is not part of the Applicant's need for this Project. Large battery storage referred to as a buffer, again is being deployed at large scale across the market. This does not address the need for the energy to be available at the times of highest demand. To fully understand the suggestion and any market mechanisms, that would facilitate changes to the network if any, would normally be subject to market consultation and need to take into account the energy needs of the nation. At each key stage of the consultation and submission process, in addition to the policy terms, the technical basis for the need case is reviewed and updated. Both the contracted background, as contained in the NESO Transmission Entry Capacity Register and the NESO Electricity Ten Year Statement is reviewed. The most recent update was completed to capture the latest information as of June 2025 as set out in the **7.17 Strategic Options Backcheck and Review [APP-355]** Section 3 Need case pages 20–38. This needs case addresses how at the times the demand is required in the large load centres of the Midlands, South-West and South-East the energy can reach consumers and business.
4.2. Offshore Coordination 4.2.1. EN-1 Overarching National Policy Statement for Energy (2023) discusses the benefits of a "more integrated approach to offshore transmission, which included efficient planning of the onshore network". The relevant section is copied below: *[see submission for extract]* 4.2.2. This approach is backed up by studies dating back to the Offshore Transmission Network Feasibility Study (OTNFS) in 2011 published by the Crown Estate and National Grid. The 2011 study has disappeared from previously published links, but the conclusions are quoted in a submission to the Planning Inspectorate relating to the Norfolk Vanguard Offshore Wind Farm24. 4.2.3. At a CIGRE workshop in 2011 National Grid outlined in its presentation "Developing offshore grids: An integrated approach" the potential of offshore grids, including benefits in	The Applicant stated that its existing projects EGL1,2,3,4,5 and Sea Link all are installing a single 525 kV 2 GW solution, each requiring two convertors, one at each end and one Bi-pole (two sets of cables) each. These projects have already contracted or are seeking to contract into the market, so already consume market capacity in their own right in near term timescales. To provide the capacity required by the Applicant's project, high voltage direct current (HVDC) solutions of 6 GW capacity are required. 525 kV HVDC cable is the highest voltage cable available in the world currently and a bi-pole pair highest capacity is 2 GW, along with the capacity limits for HVDC power electronics at 525 kV. The TenneT connections referred to within the response are based upon the same technology as Sea Link and the EGL projects, utilising 525 kV HVDC Convertors and Cables. The only difference being that some of their proposed links connect directly from windfarms to the onshore transmission system. Therefore there is limited differences in proposals being progressed by the Applicant in Great Britain and

[13] NESO (2024) *SIF R1 Beta- Network-DC Circuit Breakers Annual Report 2024*

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areas aspects such as security and resilience25. A slide from the workshop is provided in Appendix B. 4.2.4. The DNV report associated with the 2020 ESO Offshore Coordination Project referenced in NPS EN-1 clearly demonstrated how the benefits from offshore coordination are particularly marked in relation to environmental impacts, social and local impacts and cost 26. 4.2.5. Both the 2023 and 2025 versions of EN-5, emphasise the importance of offshore coordination. For example, Sections 2.12.4 and 2.12.6 from EN-5 2023 are copied below. *[see submission for extract]* 4.2.6. The technology is available now. TenneT is for example building "at least 13 high-voltage direct current (HVDC) offshore grid connection systems with a transmission capacity of 2 gigawatt (GW) each in the Dutch and German North Sea by 2031"27. 4.2.7. Despite the acknowledged benefits there is no offshore coordination within the Norwich to Tilbury project. Current plans for the proposed connections of the East Coast Generation Group at the EACN substation represent the most harmful means of connection. This is due to: • The use of HVAC for the export cables. Converting to HVDC would greatly reduce the number of cables required and offer much greater flexibility in the location of the grid connection. • The need for separate radial connections for each windfarm. • The currently proposed siting of the EACN substation and the cable routing required to reach it. 4.2.8. From an early stage the East Coast Generation Group windfarms (North Falls and Five Estuaries) indicated a desire to connect offshore. 4.2.9. Provision was made in the North Falls DCO application for an offshore platform for this purpose, with the intention that this could also serve Five Estuaries. In fact, an offshore substation is shown as the "Connection Site" for both the North Falls and Five Estuaries windfarms in the NESO "Transmission Entry Capacity" (TEC) Register28. 4.2.10. It has been stated that North Falls and Five Estuaries plan to coordinate onshore cable excavation activities, but this is something that should happen as a matter of course and it does not amount to offshore coordination. 4.2.11. With proper offshore coordination, the number of radial cables can be reduced dramatically. Report "OCSS Review"29, illustrates how the total number of separate onshore cables for North Falls and Five Estuaries would be reduced from 12 to 2, greatly reducing the impact. 4.2.12. The location of connections can also be moved, as illustrated for example by National Grid changing the connection point for the Nautilus interconnector project in 202530. 4.2.13. Noting the cost and the harm resulting from connecting at the currently proposed location of EACN, and the ability to connect in less harmful ways, this location should not be treated as a fixed constraint in the design. 4.2.14. Section 2.13.9 of EN-5 (2023 & 2025) states: "Radial offshore transmission options to single windfarms should only be proposed where options assessment work identifies that a co-ordinated solution is not feasible. For projects which had firm connection agreements in place prior to completion of the HND (formerly known as 'Early Opportunities' projects)37, co-ordinated design work should be brought forward by applicants". 4.2.15. Report "OCSS Review" 31 illustrates how other credible offshore coordination options were available despite the cancellation of the Government's OCSS project. 4.2.16. The "OCSS Review" report also questions why the 2.9GW HVDC circuit from Hornsea 3 does not continue to Tilbury, as this would deliver half the required Norwich to Tilbury capacity with just 2 pairs of HVDC cables. The remainder of the requirement could be delivered directly to the Tilbury area by the small amount of offshore coordination proposed in the "OCSS Review" report.	technologies used in Europe. Many of the links in Europe are point to point. If networks were to be interconnected and connect multiple generation stations, those networks will need HVDC circuit breakers or limit the loss of infeed, which in the UK is no more than 1,800 MW of generation on an individual unprotected HVDC System. HVDC circuit breakers have not been used anywhere in the UK or Europe with no manufacturer having yet installed or demonstrated a commercial version. The Applicant is part of a Beta phase innovation project seeking to prove and utilise this technology; however, that project is still in-flight and has not yet yielded the development phase. The Applicant is using 525 kV HVDC technology to achieve ratings it requires for the HVDC connections; the Caithness Moray Shetland project at 320 kV is seeking to be the first multi-terminal HVDC and is running the innovation project on HVDC circuit breakers at 320 kV in Beta phase, although the multi-terminal line would not require HVDC circuit breakers should the innovation project fail, as the amount of generation connected to the Caithness Moray Shetland project is below 1,800 MW. 525 kV circuit breakers would then be a step beyond this phase, so currently in Europe and UK no HVDC circuit breakers have been used, tested, or demonstrated at any voltage. The National Energy System Operator (NESO) innovation SIF R1 Beta- Network-DC Circuit Breakers Annual Report 2024[14] makes it clear there have been delays and manufacturer resource is stretched and market incentives are low, but the project has been expecting tenders to start development. The Applicant agrees that electrically separate and isolated point to point HVDC Links do not require HVDC circuit breakers. However, the Applicant has always made reference for the need for such circuit breakers to be used on integrated HVDC networks and networks where more than 1,800 MW of generation would be required to connect to the network, as is the case if North Falls, Five Estuaries and Tarchon are required to connect to a HVDC network. The availability of HVDC circuit breakers is another technical limitation at the current time. This restricts any generation connecting to a HVDC network to 1,800 MW because, without the circuit breakers, the whole network would be lost. This would result in widescale transmission system problems and would be a breach of the National Electricity Transmission System Security and Quality of Supply Standards, which is a requirement in the Applicant's licence, Condition D3: Transmission system security standard and quality of service. In Great Britain the licensing of transmission owners is set to two categories, Onshore Transmission Owners and Offshore Transmission Owners. As such the connection of any Offshore Windfarm involves an offshore transmission connection and an onward onshore Transmission Connection. The Applicant (National Grid Electricity Transmission) as an Onshore transmission licence holder as an entity is not allowed to participate in the offshore transmission market. National Grid is allowed a fully business separated Offshore – Transmission licence but would not be the same entity as the Applicant. Most Offshore transmission owners are complete and separate third parties that work with the NESO regarding their applications. Therefore, most offshore windfarms are shown as connecting to offshore platforms and it is for the Offshore Transmission Owner (OFTO) Licence holder to provide the design for the connection. This does not mean the OFTO will provide an integrated solution as indicated in the response, more that the offshore platform is the connection into the OFTO which can provide AC, HVDC, Radial or Integrated solutions. With reference to the following requirements, paragraph 2.13.9 of National Policy Statement (NPS) EN-5 (2024) states: '*Radial offshore transmission options to single windfarms should only be proposed where options assessment work identifies that a co-ordinated solution is not feasible. For projects which had firm connection agreements in place prior to completion of the* HND (formerly known as 'Early Opportunities' projects), co-ordinated design work should be brought forward by applicants'. The most recent impact assessment carried out by the NESO known as the HND Collaborative Impact

[14] NESO (2024) *SIF R1 Beta- Network-DC Circuit Breakers Annual Report 2024*

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4.2.17. Every effort should have been made by the Applicant to support the East Coast Generation Group in connecting offshore as allowed for in their respective DCO applications. The offshore coordination enabled by this would greatly reduce the harm caused. It would only require two HVDC export cables (one pair) instead of 12 HVAC export cables. 4.2.18. This would also show commitment to the Holistic Network Design (HND) methodology introduced by NESO July 2022 where the equally weighted objectives of "cost to consumer", "deliverability and operability", "impact on environment" and "impact on local communities" are applied	Assessment and Asset Classification as notified to the Offshore Network Regulation Director of Ofgem on 28 October 2025[15] noted the following: *'The Collaborative Impact Assessment was submitted collectively by the offshore wind farms being developed by partnerships off the east coast of Scotland: Ossian (SSE Renewables, Copenhagen Infrastructure Partners and Marubeni Corporation), CampionWind (ScottishPower and Shell) and Morven Offshore Windfarm (JERA Nex BP and Energie Bafen-Württemberg AG), as well as the Transmission Owners (TOs), National Grid Electricity Transmission (NGET) and Scottish and Southern Electricity Networks Transmission (SSEN-T). …* The conclusion of our analysis resulted in each of the offshore wind farms now connecting directly to the onshore network without the interconnectivity offshore. With a new HVDC offshore link replicating the offshore power transfer of the original design.' The more detailed HNDFUE Impact Assessments – Collaborative Impact Assessment Outcome Summary[16] set out on the NESO website provides the following reasoning for its outcome: '*This topology demonstrates a lower offshore component cost than the original recommended HNDFUE design, due to its simpler offshore topology. It also provides a simpler and less complex offshore network, addressing the delivery parties' operability and commercial concerns with the original recommended HNDFUE design. It has network power flow similarities with the original recommended HNDFUE design which in turn contributes to similarities with performance across the HND design criteria. Additionally, this topology performs similarly on environmental and community HND design criteria, having comparable constraints to the original recommended HNDFUE design. The offshore wind farms involved in this network design are large complex projects, facing challenges such as deployment of novel offshore floating wind technology alongside a competitive HVDC offshore supply chain. The updated network topology balances the risk fairly across all parties to progress their designs through detailed design and into delivery phases of development.'* These changes not only reflect the complexity and operational issues the Applicant has highlighted in responses to this issue but also, again, raises from multiple developers the competitive HVDC offshore supply chain as of concern, and states the new design has a lower offshore component cost than the original HNDFUE design. The development of offshore networks in reports referenced in the response are constantly changing as demonstrated by the latest HND impact assessments from 2025 referenced above in our response. Reports from 2011 to 2020 are being supplemented all the time with additional evidence following more detailed assessments being carried out by HND impact reports and other developments worldwide. This is further supplemented as stated above by the issues set out in the May 2024 DNV report Multi-terminal HVDC Grid: Current Status and Next Steps[17]. Slides before the 'Future developments' slide set out in the response, identify 'What are the main barriers?': • 'Inadequate cross-jurisdiction coordination - Between states; Between ISOs and non-ISOs; Between countries • Incompatible regulatory frameworks Insufficient operational and planning experience • Proven protection and control strategy* • Lack of standardization • Unsolved vendor interoperability issues • Limited supply chain* • Onshore AC grid constraints*' Those marked with an asterisk (*) above are consistent with the points the Applicant has made about, supply; protection and control (specifically HVDC circuit breakers where HVDC networks are

[15] NESO (2025) *NESO letter to Ofgem regarding HND Collaborative Impact Assessment and asset classification*

[16] NESO (2025) *HNDFUE Impact Assessments – Collaborative Impact Assessment Outcome Summary*

[17] DNV (2024) *Multi-terminal HVDC Grid: Current Status and Next Steps*

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	interconnected or connect generation); and the urgent need to resolve AC grid constraints set out within the **7.17 Strategic Options Backcheck and Review [APP-355]** Section 3 Need case pages 20–38 NPS EN-1 (2024) identifies an urgent national need for electricity infrastructure of this nature, which is required in the national interest to be delivered as soon as possible. Therefore, the timing and need for the Project set out in Section 3 Need case pages 20–38 of **7.17 Strategic Options Backcheck and Review [APP-355]** remains urgent within the requirements of NPS EN-1 and EN-5, alongside the Electricity Act 1989 and Transmission Owner Licence requirements recognised within the NPSs and the Applicant's obligations.
4.3. Application of the Holford and Horlock Rules 4.3.1. The Holford and Horlock Rules are the key design guidelines in NPS EN-5 for the routing of new overhead lines and for the design and siting of substations. 4.3.2. Rule 1 from Applicant's document on the Holford Rules34 is shown below: *[see submission for extract]* 4.3.3. Instead of avoiding an area of "highest amenity value", current proposals entail the infrastructure crossing the Dedham Vale National Landscape. This is despite the enhanced protection afforded by the change from "Area of Outstanding Natural Beauty" to "National Landscape". 4.3.4. Even if it was accepted that the only viable option for the project was to cross the National Landscape, the least harmful solution should have been chosen. Significantly less harm would be caused by a fully underground HVDC solution for the project instead of the proposed underground HVAC sections. 4.3.5. The significantly narrower swathe would greatly reduce construction damage in the Dedham Vale, particularly if combined with cable ploughing. The visual impact in the Dedham Vale from the proposed overhead lines and cable sealing end compounds just outside the Dedham Vale would also be removed. 4.3.6. The change to underground HVDC would therefore assist in meeting the National Landscape legal duty and it would also reduce the harm to other valued landscapes and high value heritage assets along the proposed route. 4.3.7. Rules 2 and 3 from the Applicant's document on the Holford Rules are copied below: *[see submission for extract]* 4.3.8. As an example, submission [AS-065]35 by Simon Bell on behalf of Ardleigh Parish Council and Little Bromley Parish Council highlights large scale non compliance with these two Rules in the Ardleigh and Little Bromley area. This includes not avoiding "smaller areas of high amenity value" and creating a severe impact on the setting of "areas of architectural, historic and archaeological interest including Conservation Areas, Listed Buildings, Listed Parks and Gardens and Ancient Monuments". The proposed OHL route results in encirclement of the historic village centre, includes many "sharp changes of direction" and results in an excessive number of angle towers in an area of high amenity value. 4.3.9. Submission [AS-065**]** also highlights how the site selection process used for the proposed East Anglia Connection Node (EACN) substation shows very little regard to the guidelines in the Applicant's document on the Horlock Rules 4.3.10. For example, in relation to "the land use effects of the proposal that should be considered when planning the siting of substations…", the Horlock Rules state that "issues for consideration include potential sterilisation of nationally important land, eg Grade 1 agricultural land and sites of nationally scarce minerals". 4.3.11. As shown in [AS-065] the proposed site for the EACN substation is centred on an area of Grade 1 BMV land. It is also an area which also holds valuable mineral reserves, including silica sand, as demonstrated at the nearby Martells Quarry site.	The Holford Rules have been considered as part of the decision making for the Project. This is evidenced by 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] published in 2022, the Design Development Report (DDR) published as part of the 2023 non-statutory consultation (7.20 2023 - Design Development Report for the Project [APP-358]), the DDR published for the 2024 statutory consultation (7.21 2024 - Design Development Report for the Project [APP-359]) and with the application for development consent (5.15 Design Development Report [APP-122]). In completing decision making on routeing and siting, the Applicant would note that application of the Holford Rules typically involves judging alternative solutions which can present conflicting Holford Rule compliance. In respect of Rule 1, the published Holford Rules state: '*Avoid altogether, if possible, the major areas of highest amenity value, by so planning the general route of the first line in the first place, even if the total mileage is somewhat increased in consequence. Note on Rule 1: Investigate the possibility of alternative routes, avoiding if possible the areas of the highest amenity value. The consideration of alternative routes must be an integral feature of environmental statements. Areas of highest amenity value are:* 1. *Areas of Outstanding Natural Beauty* 2. *National Parks* 3. *Heritage Coasts* 4. *World Heritage Sites*' The rationale for routeing the Project through the National Landscape (and mitigating that impact through the use of underground cables) was set out in document **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** – row LV 1.15 on page 526]. In overview, there are four general route combinations available from combining either a route through or a route around the National Landscape from Bramford to the East Anglia Connection Node (EACN) substation with either a route to the north or a route to the south of Colchester for connections from the EACN substation to Tilbury Substation. Routes south of Colchester lead to interactions with Special Protection Area (SPA) and Special Area of Conservation (SAC) designations which are not fully mitigated by the use of underground cable. With these constraints, the consideration is then the need for routeing to the north of Colchester (avoiding the SPA/SAC designations) and an option with one connection through the corridor (as this corridor is avoided by the Bramford to EACN Substation route through the National Landscape) or an option with two connections through this corridor. The two corridor option arises as a consequence of routeing around the National Landscape for Bramford to the EACN substation and in the same corridor from the EACN substation to Tilbury Substation. The Applicant has concluded that the route through the National Landscape and a single route north of Colchester is preferred. This is consistent with Holford Rule 1 and has been the basis for the Project design from the outset. This is presented in **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]** from paragraph 3.5.34 to 3.5.52 with further detail within the **7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]**. Image 3.6 on page 38 of **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]** With regard to high voltage direct current (HVDC), **7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]** states that '*HVDC onshore cables have advantages over AC cables having significantly less land take, and therefore somewhat lower environmental impact*.' (paragraph 1.3.11). However, this comment only applies where HVDC onshore cables are used over a long distance, which

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	is their typical use. The benefit in terms of land take of HVDC onshore cables as opposed to high voltage alternating current (HVAC) onshore cables is the potential reduction in construction swathe due to the lower number of cables required. For a comparable 6 GW HVDC connection an illustrative construction swathe of 85 m would be expected for standard open cut installation; details are provided in **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]** Annex C Figure C1. In comparison **2.6.1 Design and Layout Plans - Subs and Cables [REP1-003]** National Grid Drawing Reference AENC-MMAC-ENG-DWG-0085-01, shows an illustrative construction swathe of 120 m. The reduction in temporary land take of the construction swathe for an HVDC installation is therefore 3.5 ha per km less than the equivalent HVAC installation. Due to the transmission network within the UK being an HVAC system, any HVDC connection would require converter stations to be constructed at either end of the HVDC onshore cable section. Based on 2 GW converter stations currently proposed on HVDC projects within the UK, a typical footprint for the 2 GW converter compound would be 8.75 ha. Three 2 GW converter stations would be required at each end of the cable section to accommodate the 6 GW capacity required. Therefore, a typical footprint for a 6 GW system would be 26.25 ha at each end. In addition to this compound area (fenced compound) for the converter stations, additional land take is required for drainage, landscaping, access and construction enabling works such as a construction compound. Given these additional land take requirements, a total typical area of 45 ha is considered suitable at each end of the cable section, in assessing the land take needs for a 6 GW group of converter stations. Therefore, the total additional land take required for an HVDC onshore cable project, in comparison to an HVAC onshore cable project, is 90 ha. The additional land take required for HVDC converter stations is only balanced in land take terms with a Project length of 25.7 km. However, given that the majority of the HVDC additional land take is permanent and the majority of the reduction in land take is temporary use only, in reality a much longer cable section would be required to balance the environmental impacts. With regard to the submission by Simon Bell on behalf of Ardleigh Parish Council and Little Bromley Parish Council, the Applicant responded to this in **8.4.7 Applicant's Comments on any Further Information or Submissions Received by Deadline 1 [REP2-027]**, Table 3.1. With regard to the Horlock Rules, these were devised by National Grid in 2006 and which provide guidelines for the siting and design of new substations, or substation extensions. They also concern the siting of Cable Sealing End (CSE) compounds and line entries. In summary, like the Holford Rules, they facilitate the consideration of environmental factors and amenity within the design and siting of new substation infrastructure. In overview, the Rules seek to reduce any adverse impacts associated with new overhead lines and substations through the adoption of a series of 'common sense' rules. The Horlock Rules, are identified in Chapter 5 of **7.15 Design and Access Statement [REP2-020]**. These seek to inform the siting decisions by guiding them away from areas which are considered to be of the highest amenity value, and encouraging particular design outcomes by maintaining as direct and straight an alignment as possible. It is clear from the caveats within the wording of different Rules, however, that balanced decision-making judgements are required on a case-by-case basis, informed by the unique circumstances of a location. The Applicant's position is that the consideration of the guidance in the Horlock Rules has been consistently applied with due regard to other relevant factors and respecting the flexibility inherently allowed for within the Rules. The Applicant notes the reference to Horlock Rule 6: *'The land use effects of the proposal should be considered when planning the siting of substations or extensions.* *Notes:* *1 Issues for consideration include potential sterilisation of nationally important land, eg Grade 1 agricultural land and sites of nationally scarce minerals.* *2 Effects on land drainage.*' As set out in **8.4.7 Applicant's Comments on any Further Information or Submissions Received by Deadline 1 [REP2-027]** page 9, the Applicant notes that the site of the East Anglia Connection Node (EACN) substation is on land identified as being Grade 2 as presented in **6.6.F3 Environmental**

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	Statement Figure 6.3 - Detailed Agricultural Land Classification Mapping [APP-143] and **6.6.A1 Environmental Statement Appendix 6.1 - Agricultural Land Classification Report [APP-139]**. The Project has sought to minimise impacts on Best and Most Versatile (BMV) agricultural land as far as practicable and includes mitigation measures to reduce impacts on the soil resource. Given the predominance of BMV agricultural land within East Anglia, it has not been possible to avoid both temporary and permanent effects on this resource. The permanent loss of BMV land is considered necessary on the basis that there is urgent need for critical national priority (CNP) infrastructure such as the Project. The routeing and siting selection process confirms that there are no other suitable sites of poorer agricultural quality that can accommodate the Project. It is acknowledged that the Project will result in a loss of BMV land. During route optioneering the impacts on agricultural land, including on agricultural land-take (such as sterilisation) and on agricultural activities / operations, as far as was understood based on the data available at the time, were a consideration in the route selection process, as outlined in 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]. The Applicant has sought to minimise impacts on Best and Most Versatile land but notes that this is one of a range of considerations within the balanced decision-making process. Given the predominance of BMV agricultural land within East Anglia and the geographical extent and scale of the Project, it has not been possible to avoid both temporary and permanent effects on this resource. The permanent loss of BMV land is considered necessary on the basis that there is urgent need for critical national priority (CNP) Infrastructure such as the Project. The routeing and siting selection process confirms that there are no other suitable sites of poorer agricultural quality that can accommodate the Project. The Applicant can confirm that its siting studies for the East Anglia Connection Node (EACN) applied the Horlock Rules. The Applicant would also note that the Horlock Rules (as with the Holford Rules) should be recognised as providing guidance to make a balanced decision given the potential for conflicting consistency with different Rules. 7.18 2022 Corridor and Preliminary Routeing and Siting Study [APP-356] and the 2023 [APP-358] and 2024 [APP-359] Design Development Reports (DDR) (available on the Project website) and the 2025 5.15 Design Development Report [APP-122] published with the application for development consent, all set out how the Horlock Rules informed decision making. We use the Environmental Impact Assessment (EIA) process to inform the balance and define our proposals that we take forward, and which are also informed by feedback. The 716 Design Approach for Site Specific Infrastructure (DASSI) [Revision B] explains that the location benefits from existing vegetation, landform and shelterbelts, and was selected using the Horlock Rules specifically to minimise visual prominence and integrate with the surrounding rural character. Visual considerations formed an important part of the decision to adopt Air Insulated Switchgear (AIS) technology at EACN. AIS avoids a large Gas Insulated Switchgear building, reduces massing and height, and provides a more open arrangement that is significantly easier to screen. This is a clear example of taking opportunities to improve the appearance of the development. The Applicant would note that application of the Horlock Rules typically involves balancing alternative solutions which can present conflicting Horlock Rules compliance albeit that all aspects have been considered.
4.4. Natural Capital and Socio-economic Impacts 4.4.1. It is widely accepted that infrastructure projects can have very significant socio-economic and natural capital impacts. It is therefore vital that best practice is employed to understand these impacts when assessing alternatives. The established tool for this is the HMT Green Book.	The Applicant acknowledges the position of Pylons East Anglia and repeated request for HM Treasury Green Book Analysis. The Applicant has consistently reiterated its position that that the Treasury Green Book is not relevant to its projects. It therefore rejects the entirety of the analysis referred to in this comment. For ease of reference, the Applicant has previously stated in page 15 of **8.5.4 Applicant's Response to the Open Floor Hearings [REP1-140]**: '*the Treasury Green Book provides guidance on the interpretation by public servants of public spending, assets and resources for projects, policies and spend from the public purse. That is not relevant for National Grid Electricity Transmission. There is no*

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4.4.2. Since the initial consultations on the Norwich to Tilbury project, Pylons East Anglia Ltd has requested the Applicant to show adherence with the Green Book, but this has been without success. 4.4.3. Use of the Green Book is referenced in the 2023 and 2025 versions of the National Policy Statements for Energy. 4.4.4. Overarching National Policy Statement for Energy (EN-1) references use of the "Enabling a Natural Capital Approach", which is a key process in the HMT Green Book. 4.4.5. Section 4.6.16 of both the 2023 and 2025 versions of EN-1 states: "Applicants should make use of available guidance and tools for measuring natural capital assets and ecosystem services, such as the Natural Capital Committee's 'How to Do it: natural capital workbook', the government's guidance on Enabling a Natural Capital Approach (ENCA), and other tools that aim to enable wider benefits for people and nature". 4.4.6. The Natural Capital Committee (NCC), who were authors of the Green Book guidance, were very clear on the applicability to infrastructure projects. Its "End of Term Report" stated: "The NCC recommends that all infrastructure projects should take full account of natural capital by including it in the project appraisal process as per the Green Book guidelines."37 4.4.7. The "Appraisal of Sustainability" 38 report for the 2023 National Policy Statements for Energy endorses "Alignment with HM Treasury Green Book principles" when "conducting strategic options appraisal". This is to "help ensure that development proposals are approached in a holistic way that optimises the social / public value and will help ensure a joined-up approach to development". 4.4.8. Both the 2023 and 2025 versions of the Overarching National Policy Statement for Energy (EN-1) point to national guidance on infrastructure design and reference the "Design Principles for National Infrastructure" published by the National Infrastructure Commission (NIC) in 202039. 4.4.9. In February 2021 the NIC published "Natural capital and environmental net gain: A discussion paper"40. This report recognises the importance of natural capital and references HM Treasury's Green Book appraisal guidance and the associated Defra guidance on "enabling a natural capital approach". 4.4.10. To illustrate the importance of using the HM Treasury Green Book an exercise was carried out by Pylons East Anglia in 2025. This is discussed in report "Norwich to Tilbury Project Green Book Analysis" which was included as part of the representation by Pylons East Anglia Ltd submitted on 26 November 202541, 42. 4.4.11. The most compelling use of the Green Book on this project is for the balanced analysis of alternatives for best outcomes. Without this harm is not properly assessed. 4.4.12. The Pylons East Anglia analysis highlighted, for example, the significance of the costs imposed on communities through loss of natural capital, impact on property values and impact on businesses. 4.4.13. The importance of considering natural capital is highlighted in HM Government report "Global biodiversity loss, ecosystem collapse and national security", published on 20 January 202643. Some stark warnings from the report are copied below: *[see submission for extract]* 4.4.14. In the report: "The role of natural capital in the green economy: Government Response" the Government refers to "…the critical role natural capital plays in delivering the Government's mission to secure sustained economic growth" 44. The report also endorses use of the HMT Green Book and the Enabling a Natural Capital Approach (ENCA). 4.4.15. In the HM Government report: "Enabling a Natural Capital Approach guidance", updated 10 February 2026, it is stated that: "Natural capital has become a standard analytical approach to thinking about nature." 4.4.16. For reference, the Deadline 2 comments from Pylons East Anglia Ltd relating to the HMT Green Book were provided in **[REP2-056].**	*requirement in the Planning Act 2008 for developers to have to submit a Treasury Green Book assessment as part of a Development Consent Order (DCO) application. National Grid Electricity Transmission is an Ofgem regulated business, with obligations to consider customer, environmental and other considerations as outlined in the Electricity Act 1989 and in its licence commitments. Consideration of the costs of a project and the funding it should receive via the regulatory settlement is the subject of a separate regulatory process, and it is not appropriate for the Planning Inspectorate, Examining Authority or the Secretary of State in their remit under the Planning Act 2008 to seek to duplicate other regimes.*' The Applicant has further responded to Pylons East Anglia previously on the matter of Natural Capital, most recently at page 231 of **8.4.8 Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [REP3-070]**. This sets out how the Applicant is delivering Biodiversity Net Gain (BNG), which forms a component of Environmental Net Gain. It further clarifies that whilst the Applicant seeks to deliver Environmental Net Gain in line with national policy, there is no statutory or policy requirement to quantify the gains or a standardised single metric to do so, in contrast to BNG. A proportionate approach has therefore been adopted, seeking to deliver such benefits without quantifying them numerically.

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4.5. Cumulative Impact 4.5.1. There are various locations where the current proposals for the Norwich to Tilbury project would result in severe cumulative impact from both proposed and consented developments. 4.5.2. This applies to related infrastructure projects as planned for grid connections in places such as Bramford and Ardleigh. It also applies to other non-related developments such as the consented Lower Thames Crossing and Tilbury 3 port expansion. 4.5.3. Within communities there is a lack of understanding of the cumulative impact, even among those living near the proposed locations. 4.5.4. The lack of suitable plans showing all the associated developments around the proposed East Anglia Connection Node (EACN) substation site was highlighted by the ExA in ExQ1 “GEN 1.14”. This question was issued on 20 March 2026, demonstrating that the issue persisted significantly into the Examination stage of the DCO. 4.5.5. The scale of the infrastructure developments also presents significant safety, resilience and security issues, as highlighted in submissions from Burstall PC, Little Bromley PC and Ardleigh PC.	The Project would be designed, constructed and operated in accordance with applicable health and safety legislation. The Project will need to comply with design safety standards including the Security and Quality of Supply Standard (SQSS), which sets out the criteria and methodology for planning and operating the National Electricity Transmission System (NETS). This informs a suite of National Grid policies and processes, which contain details on design standards required to be met when designing, constructing and operating assets such as those proposed for the Project. Given the nature of electricity transmission infrastructure compared to other types of infrastructure projects, the Project design is governed by statutory duties and obligations set out under the following regulations and legislation: • Electricity Act 1989 – efficient, co-ordinated and economical • Transmission licence obligations – connections and security of supply • NETS SQSS – design safety standards • The Construction (Design and Management) Regulations 2015 • Health and Safety Legislation. These design safety standards constitute an embedded mitigation measure (see 6.4 Environmental Statement Chapter 4 - Project Description [APP-130]). Existing National Grid processes are designed to identify potential security and safety risks during construction and operation (and maintenance) (including risks from Major Accidents and Disasters) and to design these out at each stage of Project development. This informs a suite of National Grid policies and processes, which contain details on design standards required to be met when designing, constructing, and operating assets such as proposed on the Project. 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] presents an assessment of cumulative effects based on agreed methodology in 6.19 Scoping Report [APP-288 to APP-296] and 6.20 Scoping Opinion [APP-297] which includes consideration of other associated energy infrastructure projects proposed for Ardleigh and the adjacent parishes of Little Bromley and Lawford. A full list of other developments considered is detailed within 6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283]. The cumulative effects assessment also follows the Planning Inspectorate’s advice page on Cumulative Effects Assessment. With regard to comment regarding the provision of a plan showing all the associated developments around the proposed East Anglia Connection Node (EACN) substation, the Applicant provided this plan as Appendix A to 8.9.1 Applicant’s Response to First Written Questions [REP3-074].
4.6. Cost 4.6.1. As discussed in the Pylons East Anglia report “Norwich to Tilbury Project Green Book Analysis” 47, Ofgem, as the economic regulator, has previously made it clear that financial costs are not the only consideration. Ofgem does not always approve the lowest cost option. 4.6.2. In the past Ofgem has highlighted that “companies must take into account the environmental impacts of new investment. This includes the visual impact of new infrastructure. The companies must demonstrate they have considered and consulted on alternative options, such as different routes, undergrounding and subsea cables.” 48 49 4.6.3. The message was reinforced in a letter dated 31 July 2025 from Akshay Kaul, Director General for Infrastructure, to NESO and transmission owners, such as the Applicant50, 51. The letter states the following, for example: “…These solutions may not always be the cheapest option but rather the ones that drive long-term consumer benefit alongside clear evidence of the benefits to, and consideration of, local communities”. “We expect NESO and TOs to work together, fully considering environmental and community impacts at the design stage before recommending major infrastructure projects.” “NESO must take into account views of the local communities and incorporate those into its strategic plans where appropriate.” “TOs must give proportionate consideration of	As set out above in response to Section 2 of Appendix D [REP3-132], the Applicant considers it has sufficiently considered alternatives and has responded to Pylons East Anglia and other Interested Parties on this point in previous submissions. The Applicant has also reiterated in the response to paragraph 4.4 above that the Green Book is not relevant to the Project.

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wider socio-economic impacts when designing their projects." "As the economic regulator, Ofgem will continue to support project designs and network solutions that are in the consumers' best interest, finding the balance between present and future needs. While Ofgem will continue to scrutinise project costs to ensure these are efficient, it does not mean that we will always approve the lowest cost option. We recognise there are long-term benefits and community considerations that must be considered in a proportionate way alongside financial costs".	
5. Design Reviews The use of design reviews at predefined stages throughout the design process is recognised as established best practice for engineering projects, and indeed for many other types of design projects. Design reviews are an essential requirement of the BS EN ISO 9001 Quality Management System, which is stated by the British Standards Institution (BSI) to be "the most widely recognized quality management standard in the world" 52.	To demonstrate commitment towards securing Good Design, the Applicant will confirm the governance and assurance process including design review at the detailed design stage in the Design Champion Brief to be included within the **Design Approach for Site Specific Infrastructure (DASSI) [Revision B]** to be updated at Deadline 5. The Great Grid Partnership has collaborated with the Front-End Engineering Design team and will transition to developing the detailed design for construction subject to receiving consent.
5.1. The Requirement for Design Review Panels on NSIPs 5.1.1. Both the 2023 and 2025 versions of EN-1 reference the "Design Principles for National Infrastructure" published by the National Infrastructure Commission (NIC) in 2020. This is referenced in Footnotes 122 and 102 respectively. It states the following: "Design principles should take into account any national guidance on infrastructure design, this could include for example the Design Principles for National Infrastructure published by the National Infrastructure Commission…". 5.1.2. The NIC "Design Principles for National Infrastructure" document is also referenced in the "Energy National Policy Statements, Appraisal of Sustainability - Appendices Supporting Evidence Volume I, November 2023". 5.1.3. The NIC report states: "The National Infrastructure Commission established an expert design group because we believe the UK needs renewed ambition for the quality of our infrastructure" 53. 5.1.4. The report is clear on the requirement for design reviews panels on every nationally significant infrastructure project: "The first National Infrastructure Assessment also recommended that design review panels should be set up for every nationally significant infrastructure project. Design review panels exist on some projects currently and there are some good examples. But the opportunity to do better should not be missed—all major infrastructure projects deserve to have design review panels…"	National Policy Statements EN-1 (2024) and EN-5 (2024) do not impose a requirement for applicants to undertake an independent design review. NPS EN-1 sets out that applicants are expected to: • Show that good design principles have been embedded from the outset • Explain how the design has evolved through iterative assessment, including environmental and technical inputs • Provide sufficient information to allow the decision maker to understand the design rationale and flexibility. • NPS EN-5 expects applicants to: • Justify design choices, e.g. technology, routeing, alignment are justified and proportionate • Show how design responds to technical constraints alongside environmental considerations • Demonstrate that impacts have been minimised through siting and design, consistent with the need for an efficient and viable network. The Applicant has appointed a Development Design Champion (DDC) from within National Grid's existing design governance structure. The role of the DDC is to ensure a consistent design language in line with National Policy Statement (NPS) EN-1 (2024), NPS EN-5 (2024), the Holford and Horlock Rules, and other relevant guidance will be followed through in post-consent decisions. National Grid has extensive experience in the design, siting, engineering and delivery of the type of electricity transmission infrastructure proposed. It also has established internal design governance processes covering transmission design, landscape integration, environmental mitigation and delivery.
5.2. The Need for Design Reviews on NSIPs to be Independent 5.2.1. The need for design reviews to be independent on projects of this type is confirmed in advice from the Design Council, the Ministry of Housing, Communities & Local Government and the Planning Inspectorate. 5.2.2. The Design Council's report "Design Review: Principles and Practice"54 states: "Design Review is an independent and impartial evaluation process in which a panel of experts on the built environment assess the design of a proposal"… "…gives decision makers the confidence and information to support innovative, high quality designs that meet the needs of their communities and customers, and to resist poorly designed schemes." 5.2.3. The Design Council's report outlines ten fundamental principles of Design Review, and this further underlines the importance of independence: 5.2.4. Similar comments are made by the Ministry of Housing, Communities & Local Government:	National Policy Statements EN-1 and EN-5 (2024) do not impose a requirement for applicants to undertake a design review by an independent design review panel. Paragraph 4.7.2 of NPS EN-1 states: *'Applying good design to energy projects should produce sustainable infrastructure sensitive to place … efficient in the use of natural resources … and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible'.* NPS EN-1 also recognises under paragraph 4.7.6 that there may be limited choice in physical appearance of energy infrastructure, but there could be opportunities to demonstrate good design in terms of siting. This can all be achieved through the appointment of a Design Champion and post-consent design reviews. The Advice Note does not mandate independent design review panels for Nationally Significant Infrastructure Projects (NSIPs); rather, it identifies a range of mechanisms through which good design outcomes may be achieved. Independent design review is one such mechanism, but not a requirement, and the choice of mechanism should be proportionate to the type of infrastructure and the scope for design influence. The non-statutory advice also applies across all NSIPs, including, for example,

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5.2.5. The Planning Inspectorate "Nationally Significant Infrastructure Projects: Advice on Good Design"56 references the Design Principles for National Infrastructure published by the National Infrastructure Commission (NIC) in February 2020. The Planning Inspectorate advice makes numerous references to "independent" input to the design process. 5.2.6. The advice states that during the "Research" stage "engagement and consultation with statutory parties, affected persons, local communities and independent design panels should inform the project's design evolution. This should be explained". 5.2.7. Under the "Co-ordinate" heading it states: "Further iteration must be undertaken to refine choices for details and parameters. This should incorporate consultation responses, independent design input and ensure that design principles are being met. There may be choices to be made. Decisions need to be taken using strong design leadership, driven by the vision. This stage must set out the process by which future post-consent decision-making will be made". 5.2.8. The need for "Independent design review" is listed on the checklist of "Good design issues to consider". This checklist is referred to as an "Acceptance checklist" in the Planning Inspectorate "Achieving good design in Nationally Significant Infrastructure Projects" webinar 57.	airports, reservoirs and nuclear power stations – contexts where there may be a clear end-user interface or architectural outcomes that warrant bespoke design review. By contrast, the proposed Project comprises operational infrastructure with no public access and no requirement for reinstated public realm. On this basis, the Applicant continues to consider that a dedicated independent design review panel is not necessary. The Applicant considers that the design development process throughout the Project has been consistently and significantly in accordance with the Planning Inspectorate note 'Advice on Good Design'[18], as well as NPS EN-1, NPS EN-5, and Design Principles for National Infrastructure published by the National Infrastructure Commission[19]. This approach has been supported by an internal design review, undertaken by a design professional who had no prior involvement in the Project. The Applicant has already appointed a Design Champion, and will be appointing a second, both of whom will provide strong design leadership and support the further adherence to achieving Good Design, throughout the Development Consent Order process and post-consent.
5.3. The Timing of Design Reviews 5.3.1. Design reviews need to be carried out at planned stages throughout the design process. The NIC report "Design Principles for National Infrastructure" states: "Like design champions, review panels need to be involved early enough for their advice to shape project design. They will advocate for improvements to design that will improve the outcomes of the project, taking advantage of opportunities to achieve better value." 5.3.2. Section 4.7.4 from both the 2023 and 2025 versions of Overarching NPS for Energy EN-1 highlights the importance of addressing issues in the early development phases : "Given the benefits of good design in mitigating the adverse impacts of a project, applicants should consider how good design can be applied to a project during the early stages of the project lifecycle." 5.3.3. The following diagram illustrates how design reviews are tied into the key stages of the BS EN ISO 9001 Quality Management System. This shows the iterative nature of the process and how it relies on feedback from design reviews. 5.3.4. To obtain further reference examples, the design processes employed by National Highways and Network Rail were investigated. Similarities that these organisations have with the Applicant is that they are both responsible for linear infrastructure and are both statutory undertakers. 5.3.5. Both organisations reference the National Infrastructure Commission's Design Principles for National Infrastructure. Their processes are tailored to suit their individual requirements, but both include independent design reviews throughout the design process. 5.3.6. The following diagram *[See submission for extract]* from the document "Design review at National Highways: A guide (2022)" 62 illustrates how design reviews are held at key stages in the process from "Inception" to "Handover". 5.3.7. Further information on the design processes used by National Highways and Network Rail is provided in Appendix C-1 and C-2 respectively. 5.3.8. A selection of quotes from Appendix C-1 and C-2 are copied below: *[See submission for extract]*	*Design principles from the onset of the Project* The design development of the Project commenced prior to the publication of the Advice on Good Design (published by the Planning Inspectorate) and the introduction of design champions and design principles taking into account the Design Principles for National Infrastructure (published by the National Infrastructure Commission) that is now referred to within footnote 102 in NPS EN-1 (2024) as recommended guidance. As such, the design of the Project was not shaped by the above guidance from the outset. However, the Applicant has demonstrated in 7.15 Design and Access Statement [REP2-020] how the Project design aligns with the principles and expectations set out in the Advice on Good Design and NIC Design Guidance. This assessment ensures design can be understood in relation to the most current Planning Inspectorate Advice on Good Design and NIC Design Guidance. Section 6 of the **Planning Statement [APP-085]** sets out the project evolution and design approach taken from the onset to submission. The **Design and Access Statement [REP2-020]** sets out a summary of how good design has been applied throughout the Project. The Applicant notes the references made to the Network Rail Design Advice Panel (DAP) Project Guidance[20] and the Design review at National Highways: A guide[21] . These statutory undertakers have different licences and duty requirements in terms of accessibility and end user function when developing national transport networks. National Grid has successfully promoted several onshore electrical transmission projects through the Nationally Significant Infrastructure Projects regime without carrying out an independent design review. The policy wording between NPS EN-1 (2011 to 2024 and 2026) that encourages independent design review across energy projects has changed very little.

[18] Planning Inspectorate (2024) *Nationally Significant Infrastructure Projects: Advice on Good Design*

[19] National Infrastructure Commission (2020). Design Principles for National Infrastructure.

[20] Network Rail (2024) Design Advice Panel (DAP) Project Guidance. Design Manual NR/GN/CIV/100/01

[21] National Highways (2022) Design review at National Highways: A guide

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5.3.9. It is noted that Section 4.7.14 from Overarching NPS for Energy EN-1 (2023 and 2025 versions) states: “The Secretary of State should consider taking independent professional advice on the design aspects of a proposal. In particular, the Design Council can be asked to provide design review for nationally significant infrastructure projects”. However, this is no substitute for the established process of design reviews being performed throughout the design cycle, as these allow the design to be informed from the initial stages onwards, resulting in better outcomes. 5.3.10. A secondary benefit with independent design reviews can be in helping to build community engagement and acceptance. 5.3.11. Design reviews are therefore not effective if applied retrospectively. When the outcome has largely been determined there is very limited opportunity o inform the design. The danger is that the review becomes a “rubber stamping” exercise instead of a genuine and constructive part of the process.	The Planning Inspectorate Advice Note on Good Design[22] does not mandate independent design review panels for Nationally Significant Infrastructure Projects (NSIPs); rather, it identifies a range of mechanisms through which good design outcome may be achieved. Independent design review is one such mechanism, but not a requirement, and the choice of mechanism should be proportionate to the type of infrastructure and the scope for design influence. *Design principles to be applied post-consent* The Great Grid Partnership have now been onboarded in a design review capacity and have been engaged in the Project during the pre-submission stages. The design review process at the detailed design stage will be outlined in the Design Champion Brief to be included within the **7.16 DASSI [Revision B]** to be updated at Deadline 5. To demonstrate commitment towards securing Good Design, the Applicant will confirm the governance and assurance process including design review at the detailed design stage in the Design Champion Brief to be included within the **7.16 DASSI [Revision B]** to be updated at Deadline 5.
5.4. The Norwich to Tilbury Design Review 5.4.1. The National Infrastructure Commission (NIC) Design Principles for National Infrastructure report was published in February 2020, 2 years before the first non-statutory consultation on the Norwich to Tilbury project in 2022. 5.4.2. There was therefore sufficient time for the advice to be applied to the Norwich to Tilbury project before it became embedded in the 2023 Overarching National Policy Statement for Energy (EN-1). 5.4.3. NIC advice such as the appointment of design champions and the incorporation of design reviews simply represents established best practice. It represents tried and tested ideas. 5.4.4. In various pre-application meetings, the Planning Inspectorate provided Section 51 (s51) advice to the Applicant that related to the NIC guidance on issues such as the use of design champions and design panels. 5.4.5. At the s51 meeting with the Planning Inspectorate on 30 January 2023, the Applicant was reminded of the NIC guidance, including regarding design champions and design panels: “The Inspectorate advised the Applicant to consider and track the issue of design principles throughout the pre application stage, particularly regarding the design of the substations. The Applicant was advised to take on board comments and guidance within the National Infrastructure Commission Report, including regarding design champions and design panels. The Applicant explained that its team has a well-integrated design process, noting the relationship between the engineers and environment team and how this optimised the design from an environmental perspective”63. 5.4.6. The response from the Applicant did not therefore show commitment to engage with the NIC guidance. 5.4.7. The actions from the s51 meeting state: “The Inspectorate requested that the Applicant provide an overview of its approach to scheme design at the next project update meeting”. There are no references to any actions relating to the NIC design principles within the scheme design in the notes from the subsequent meeting held on 6 September 2023. 5.4.8. Further advice on good design was provided by the Planning Inspectorate to the Applicant at the next two s51 meetings.	*The Norwich to Tilbury Design Review* The Project’s approach to good design is embedded within a comprehensive and mature design framework, including the Design and Access Statement, the Design Development Report(s), and the Design Approach for Site Specific Infrastructure. Together, these documents provide a clear narrative of the Project’s iterative design evolution and define the design principles, parameters and Limits of Deviation that will govern detailed design. The **3.1 Draft Development Consent Order [REP3-004]** secures this framework through certified documents and enforceable requirements, ensuring that the design principles are implemented through final design and construction. Post consent design decisions will be overseen through the Applicant’s established design governance arrangements, including the Design Champion roles, providing proportionate and effective design oversight consistent with the Planning Inspectorate’s Advice on Good Design. The Applicant has taken a robust approach to design informed by the relevant design principles, including those identified by the National Infrastructure Commission, reported in the following documents submitted with the application for development consent: • **7.15 Design and Access Statement [REP-020]** sets out the design principles applied by National Grid summarises its approach to good design. The Applicant’s position is that through the application of the Holford Rules and Horlock Rules and the undergrounding policy, we are able to demonstrate that the principles of good design have been applied in the design of the Project. The NIC Design Principles was also given due regard during the development of the Project and the Design and Access Statement reflects how the Project has considered the principles including climate, people, places and value. Appendix C – Compliance with Planning Inspectorate’s advice on Good Design and NIC Design Principles was prepared to inform acceptance as advised in the Planning Inspectorate webinar on – Achieving good design in Nationally Significant Infrastructure Projects, 13 December 2024. • **7.16 Design Approach for Site Specific Infrastructure [Revision B]** outlines the design principles that can be taken forward into the detailed design stage. • **5.6 Planning Statement [APP-085]** provides a summary of the key design principles and constraints that have guided decision making reported in the various **Design Development Reports [APP-122; APP-358; APP-359 and APP-360]** and **DASSI [Revision B]**. Good design of electricity transmission

[22] The Planning Inspectorate (2024) Nationally Significant Infrastructure Projects: Advice on Good Design

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5.4.9. From the s51 meeting held on 23 October 2024: “Advice Note The Inspectorate advised the Applicant that the Nationally Significant Infrastructure Projects: Advice on Good Design has been published today and by mid-November an advice note on linear projects will be published”64,65. 5.4.10. From the s51 meeting held on 14 January 2025: “Good Design The Inspectorate advised the Applicant to view the recent webinar on Achieving good design in Nationally Significant Infrastructure Projects. This follows on from the good advice page that was signposted in the previous meeting. It is important that the Applicant demonstrates regard to these in the design documents, demonstrating how the design has evolved during the pre application stage following advice and feedback”66, 67. [https://www.youtube.com/watch?v=fN68G6vFObY] 5.4.11. The advice from both of these s51 meetings refers to NIC guidance, such as use of design champions and independent design reviews. 5.4.12. There does not appear to be any further reference to the NIC advice during the s51 meetings held on 19 March 2025 and 17 April 2025. However, at the s51 meeting held on 30 June 2025: “The Inspectorate also asked whether the project had been subject of an independent design review, to which the applicant confirmed it had not, providing its reasons for this. The Inspectorate advised the applicant to clearly explain the rationale and design decisions within its application, demonstrating its regard to the good design and linear project advice pages”68. 5.4.13. The advantages of design reviews are outlined in the Design Council’s report “Design Review: Principles and Practice”69. It states, for example, that “Design Review is a well-established way of improving the quality of design outcomes in the built environment, and it is now recognised in the National Planning Policy Framework”. 5.4.14. The report also outlines “How Design Review adds value”: 5.4.15. In the initial Examination hearings held on 10 and 11 February 2026, the Applicant emphasised the large scale of the project by stating it to be “one of the largest DCOs to date” and “the longest DCO ever sought”. 5.4.16. The scale of the project combined with the potential for the infrastructure to last in excess of 100 years70, and with effects that will last significantly longer, warrants best practice in all areas. This includes fully adhering to the NIC guidance. 5.4.17. The NIC guidance was produced because of acknowledged poor performance in the UK on infrastructure projects. The need to change the approach to infrastructure projects is echoed in the government’s 10 Year Infrastructure Strategy published on 19 June 2025: 5.4.18. The use of independent design reviews can also help to build meaningful and constructive engagement with communities. It is after all the public who will interact with and ultimately pay for the resulting infrastructure. 5.4.19. Any such project will cause largescale disruption to people’s lives and livelihoods. Much of this is not compensated for. It is therefore essential that the process is informed and scrutinised by independent experts from a suitably wide range of disciplines and that this is carried out in a transparent manner. 5.4.20. The Applicant’s document **“7.15 Design and Access Statement (Final Issue A)” [APP-353]**, includes “Internal Design Review Note” in “Appendix B”. 5.4.21. This is dated July 2025 and would therefore appear to be in response to the s51 meeting held on 30 June 2025 where, as discussed earlier, the Inspectorate asked: “…whether the project had been subject of an independent design review, to which the applicant confirmed it had not, providing its reasons for this. The Inspectorate advised the applicant to clearly explain the rationale and design decisions within its application,	infrastructure is primarily governed by application of the Holford and Horlock rules, alongside an iterative design approach informed by stakeholder engagement, relevant sections of national policy (NPS EN-1 and EN-5) and the embedded environmental design mitigation as part of the EIA process. Such good design principles are then intertwined with the technical design requirements alongside the regulatory and other constraints such as operational, safety and security requirements for new electricity transmission infrastructure. The Applicant has responded to the references made to various pre-application meetings and the s51 advice provided by the Planning Inspectorate on good design in the following document **5.1 Consultation Report - Appendix A: Meetings and correspondence with stakeholders [APP-067]**. The Applicant followed the advice received from the Planning Inspectorate and took into consideration the material presented in the webinar on *Achieving good design in Nationally Significant Infrastructure Projects*. The Applicant demonstrated regard to these in Appendix A: Guide to the Approach on Design in **7.15 Design and Access Statement [REP2-020]**: *DAS, DDR and DASSI, demonstrating how the design has evolved during the pre-application stage following advice and feedback*. The Applicant notes reference to Design Review: Principles and Practice[23] and recognises the importance of ongoing consultation with communities throughout all stages of the project, including post consent and implementation. The Applicant is committed to securing and delivering a Design Champion function. The role of the Design Champion(s) is set out in the updated **7.15 Design and Access Statement [REP2-020].** Consistent with the Institution of Civil Engineers recommendations, the Design Champion fulfils an advisory role independent of the design team, within a tripartite governance structure comprising: • The Design Champion • The Design Executive (the design team at delivery phase) • Design review input The Design Champion function will oversee the areas where there is limited scope for variation for the site-specific infrastructure as detailed in the **7.16 Design Approach for Site Specific Infrastructure [Revision B]**. The core responsibilities and oversight will be formalised in a brief that will be included in the **DASSI [Revision B]** which is a certified document under Schedule 19 in the draft **Development Consent Order (DCO) [REP3-004]**. This will ensure the influence of the Design Champion is also enforceable when securing implementation of the design principles through the final design and construction of the Project.

[23] Design Council (2019) Design Review: Principles and Practice

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demonstrating its regard to the good design and linear project advice pages”72. 5.4.22. It is noted therefore that the Applicant had not adopted the s51 advice provided by the Planning Inspectorate on 30 January 2023, where the Applicant was reminded of the NIC guidance, “including regarding design champions and design panels”. 5.4.23. As the “Internal Design Review Note” in APP-353 was produced after the event it did not inform the design. As highlighted earlier, design reviews need to be held at appropriate stages in the process from inception to completion to inform the design as it progresses. On projects of this type, an independent panel is also essential. 5.4.24. Even accepting that the report in APP-353 was an “Internal Design Review” and not an independent design review, some form of feedback on improvements that could be made and “lessons learnt” from the project would be expected. 5.4.25. The “Internal Design Review” was carried out through a very narrow lens. Noting the NIC guidance and other best practice referenced in this report the conclusion from the Internal Design Review “that an independent design review prior to the application being submitted is not considered necessary” cannot be substantiated.	

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4. Applicant's Comments on PEA Appendix E - Charles Banner KC 10 April [REP3-133]

4.1.1 The Applicant provides an opinion from Russell Harris KC in response to Appendix E of the PEA Response [REP3-133] at Appendix A of this document.

5. Applicant's Comments on PEA Appendix F - Heritage Pylons East Anglia Response 10.04.26 [REP3-134]

5.1.1 The Applicant provides its comments on Appendix F of the PEA Response [REP3-134] below. The Applicant notes that the response included three tables listing heritage assets, their Actual Visual Representations (AVRs) and the PEA assessment in comparison to the Applicant assessment. The Applicant has provided comment per heritage asset and has not sought to replicate the full tables as provided by PEA, in order to aid legibility of this document.

Table 5.1 Applicant's Comments on main text of Appendix F of the PEA Response [REP3-134]

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Purpose of Submission This submission is made in response to the Examining Authority's request for: • a comprehensive list of heritage assets that have been erroneously scoped out of assessment; and • a list of heritage assets that have been incorrectly assessed within the Environmental Impact Assessment (EIA) for the Norwich to Tilbury Project.	Noted. The Applicant acknowledges the Interested Party's concerns; however, the Applicant is confident that the assessment is robust and proportionate, and that the methodology has given appropriate weight to the potential impacts of the Project on the designated and non-designated assets, including changes to the setting of designated assets.
Scope and Methodological Limitations Pylons East Anglia is a small, community-based group representing communities along the full length of the proposed Norwich to Tilbury route. Due to limited resources, it has not been possible to compile an exhaustive list comprising the many thousands of heritage assets	Noted. The Applicant acknowledges the Interested Party's concerns; however, the Applicant is confident that the assessment is robust and proportionate, and that the methodology has given appropriate weight to the potential impacts of the Project on the designated and non-designated heritage assets, including changes to the setting of designated assets. The methodology has been agreed with Historic England (**5.9.14 Draft Statement of Common Ground - Historic England [REP3-022]**). The scoping of heritage assets is agree with

Matter	Applicant Response
potentially affected by the Project. Instead, a representative sample of assets has been identified in the tables below to demonstrate what Pylons East Anglia considers to be systemic flaws in both the scoping and assessment of heritage impacts. These examples are not isolated cases but illustrate wider shortcomings within the Applicant's approach to heritage assessment.	Historic England and the Local Planning Authorities, with the exception of Chelmsford City Council (please see Local Planning Authority responses to ExQ1 HE 1.9 and included with the Applicant's responses in **8.4.10 Applicant's Comments on Responses to ExQ1**, submitted at Deadline 4). The sample of assets that have been identified by the Interested Party are responded to below.
Summary of Key Issues Identified The accompanying tables provide examples of heritage assets which, in our view: • have been wrongly scoped out of assessment; or • have been subject to materially inadequate or incorrect impact assessment. The examples illustrate a general underestimation of harm to listed buildings, conservation areas and scheduled monuments on both sides of the proposed route. The table focuses primarily on assets that are subject to particularly significant effects and that are illustrated within Document 7.12: Visualisations, Parts 1–9.	Noted. The Applicant acknowledges the Interested Party's concerns; however, the Applicant is confident that the assessment is robust and proportionate, and that the methodology has given appropriate weight to the potential impacts of the Project on the designated and non-designated heritage assets, including changes to the setting of designated assets. As set out in the Historic England Written Representation [REP1-191] and Local Planning Authority Local Impact Reports and responses to ExQ1, there is agreement that the level of harm to heritage assets sits within the less than substantial harm category. For context, of the 2227 designated and 3542 non-designated heritage assets included in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] (noting that some groups of non-designated finds spots have been considered as a single asset to represent the likely presence of an archaeological site) there are disagreements on the conclusions of assessment with Historic England and the Local Planning Authorities for a very small proportion of these. As noted in the response above, the scoping of heritage assets is agreed with Historic England and the Local Planning Authorities, with the exception of Chelmsford City Council (please see Local Planning Authority responses to ExQ1 HE 1.9 and included here with the Applicant's responses **8.4.10 Applicant's Comments on Responses to ExQ1**, submitted at Deadline 4). Heritage visualisations have been used to inform assessment of heritage assets, in combination with relevant landscape and visual visualisations, site visits to undertake setting assessment, and information from the sources set out in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**. The Applicant confirms that, at

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	the time of the Development Consent Order submission, historic environment stakeholders, including Historic England, were engaged in selecting viewpoints and the corresponding visualisation types. The agreed viewpoints and their locations, and the visualisation formats to be used, reflected that feedback and informed the visualisation package accompanying the Project. Please note that the Applicant gave full detail on new photography and photomontages which will be provided at Deadline 4 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** – HE 1.13. Viewpoint photography and visualisations are not required by the specialist setting assessment guidance[24] but they are noted as one of the tools to assist in assessment.
Use of AVRs and Visual Evidence The Applicant's Photomontages (henceforth referred to as AVRs (Actual Visual Representations) provide clear visual evidence of the scale, height and prominence of the proposed infrastructure in relation to heritage assets. While only a limited number of AVRs have been produced, they provide a valuable indication of the magnitude of impact experienced at varying distances from the proposed alignment. The impacts demonstrated by these AVRs are directly transferable to other heritage assets located at comparable distances from the scheme, many of which were either scoped out or subject to limited and subjective assessments.	The Applicant acknowledges the Interested Party's concerns; however, the Applicant is confident that the assessment is robust and proportionate, and that the methodology has given appropriate weight to the potential impacts of the Project on the designated and non-designated assets, including changes to the setting of designated assets. The methodology for scoping of heritage assets to determine those within **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** that would be considered in detailed assessment was agreed with historic environment stakeholders as set out in the Statements of Common Ground. As noted in the response above, the scoping of heritage assets is agreed with Historic England and the Local Planning Authorities, with the exception of Chelmsford City Council (please see Local Planning Authority responses to ExQ1 HE 1.9 and included here with the Applicant's responses **8.4.10 Applicant's Comments on Responses to ExQ1**, submitted at Deadline 4). Heritage visualisations have been used to inform assessment of heritage assets, in combination with relevant landscape and visual viewpoints, site visits to undertake setting assessment, and information from the sources set out in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**. Viewpoint photography and visualisations are not required by the specialist setting assessment guidance[25] but they are noted as one of the tools to assist in assessment.

[24] Historic England (2017) *The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)*

[25] Historic England (2017) *The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)*

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Assessment of Setting A fundamental concern with the Applicant's assessment of effects on the setting of heritage assets is that it relies almost exclusively on views from the heritage asset towards the proposed infrastructure. Pylons East Anglia considers this approach to be inherently flawed and inconsistent with Historic England's Good Practice Advice in Planning: GPA3 (2nd Edition, 2017). GPA3 makes clear that setting is defined by how a heritage asset is experienced, and while views to and from an asset are important, they are not determinative. The experience of setting is also shaped by other environmental and contextual factors, including noise, movement, scale, historic relationships between places, and landscape character. Importantly, heritage assets may retain strong historical or aesthetic connections even where they are not intervisible. On this basis, the scoping out of heritage assets on the grounds that boundaries are screened by mature vegetation is unsound. Vegetation is seasonal, transient and subject to ongoing management, and does not negate the how an asset is experienced in the landscape. Furthermore, many AVRs have been composed so that hedgerows, trees or buildings sit directly in the foreground, thereby artificially minimising the perceived prominence of the infrastructure. While these viewpoints may technically comply with those agreed through consultation, they fail	The Applicant has responded on this topic in **8.17 Response to Rule 17 Letter – Historic Environment** (submitted at Deadline 4). As noted in the response above, the methodology for scoping of heritage assets to determine those within **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** that would be considered in detailed assessment was agreed with historic environment stakeholders as set out in the Statements of Common Ground. The scoping of heritage assets is agreed with Historic England and the Local Planning Authorities, with the exception of Chelmsford City Council (please see Local Planning Authority responses to ExQ1 HE 1.9 and included here with the Applicant's responses **8.4.10 Applicant's Comments on Responses to ExQ1**, submitted at Deadline 4). Heritage visualisations have been used to inform assessment of heritage assets, in combination with relevant landscape and visual viewpoints, site visits to undertake setting assessment, and information from the sources set out in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**. Viewpoint photography and visualisations are not required by the specialist setting assessment guidance[26] but they are noted as one of the tools to assist in assessment. Viewpoint locations are microsited on site but sometimes limitations in location or angle of view are not apparent until the visualisation is produced.

[26] Historic England (2017) *The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)*

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to represent the full extent of visibility, which in many cases becomes apparent only a few metres to either side.	
Failure to Assess Cumulative Change The Applicant's assessment fails to adequately address cumulative change, contrary to GPA3 guidance. Even where a heritage asset has already experienced harm from past development, further change must still be assessed to determine whether it results in additional harm, including the severance of the final historic or visual link with its original setting. There are multiple examples along the route where historic and visual relationships between heritage assets will be permanently severed by the Project. One such example is the historic relationship between Ingatestone Hall and St Mary's Church, Buttsbury, with further examples provided in the accompanying table. In addition, cumulative harm must also be understood collectively. The sheer number of heritage assets experiencing harm, regardless of the harm level assigned to each, results in a significant cumulative adverse effect on the historic environment as a whole. In particular, the cumulative harm experienced by the heritage assets associated with the village of Ardleigh, and by those heritage assets associated with Great Waltham, Little Waltham and Langleys will be of a higher level than if a project were only to impact one or two heritage assets.	The Applicant has responded regarding cumulative change and harm to multiple heritage assets in **8.17 Response to Rule 17 Letter – Historic Environment**, under section Methodology - 1 (submitted at Deadline 4). Previously the Applicant provided a response on this subject in ExQ1 HE 1.8 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. The number of heritage assets affected by the Project does not in itself lead to cumulative harm in the conventional sense of one historic receptor being affected by more than one element of the proposal. But of course, each separate incidence of harm to a specific asset identified will form part of the overall harm occasioned by the Project and must be accumulated accurately to identify the extent of the heritage harm as a whole. Each asset however should be identified and assessed for the Project's impact on it and that impact must be assessed as being within one of three categories: no harm, less than substantial harm or substantial harm. In this case there has been no identification of substantial harm. It is neither appropriate nor lawful to add up the less than substantial harms to produce a notional new 'substantial' harm category because the assessment calls for an asset by asset consideration, but the number of less than substantial harms would be a material consideration to weigh in the planning balance. The number of assets effected is acknowledged and is a function of the necessary length of the nationally important infrastructure in this case. Heritage impacts have played a significant part in the routing decisions in this case as evidenced in the DDRs **[APP-122; APP-358 and AAP-359]**. Any project meeting the need identified by EN-1 as being required in East Anglia would because of its length and the strong presumption in favour of overhead lines (a presumption which is not removed for heritage purposes) inevitably impact a large number of heritage assets' settings. The methodology for the assessment of cumulative effects for the Project is detailed in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281].** The assessment identifies two cumulative effects categories comprising intra-project cumulative effects and

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	inter-project cumulative effects as defined by the Institute of Environmental Management and Assessment[27]. Intra-project cumulative effects for heritage assets are reported **in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**. Inter-project cumulative effects are reported **in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]** and **6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]**, as updated at Deadline 4 by **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update**. The cumulative effects assessment methodology agreed through **6.19 Scoping Report [APP-288 to APP-296], 6.20 Scoping Opinion [APP-297]** and relevant national policy and guidance does not require a cumulative assessment purely based on the number of heritage assets affected by a development. This is because the significance of the majority of assets does not depend on the presence/absence of other unrelated assets within the Study Area for the Project and therefore the harm to individual assets does not alter dependent on harm caused to other assets.
Scale of Infrastructure and Landscape Impact The impact of introducing very large-scale overhead electricity infrastructure into historic landscapes has not, in our view, been properly addressed. The height, bulk and industrial character of the proposed structures results in a materially greater impact on the setting of heritage assets than infrastructure of a more modest scale. This applies equally to designated heritage assets and to the wider historic landscape within which they are experienced.	The NPSs acknowledged that there are likely to be adverse impacts including landscape and visual and historic environment impacts due to large infrastructure projects on many occasions. NPS EN-1 states that some significant residual impacts are likely for any NSIP, and particularly for an overhead line. It also states that the residual impacts are likely to be outweighed by the public need for CNP, including, for example, in circumstances where harm is occasioned to designated heritage assets. The study areas and methodology for assessment of the historic environment, and agreed with historic environment stakeholders, account for the type and scale of the Project. The **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** includes measures to retain and reinstate landscape, ecological and historic landscape features, which inform the settings of heritage assets (including protected lanes). Embedded mitigation and design alternatives were considered (**5.15 Design Development Report [APP-122]**) to protect the historic landscape as effectively as possible. Commitments to the historic environment have been outlined within **7.2 Outline Code of Construction**

[27] Institute of Environmental Management and Assessment (2011) *Special Report – The State of Environmental Impact Assessment Practice in the UK*

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	Practice [Revision D], with specific mention of mitigation to the impacts upon the historic landscape detailed under commitment H06. Further information regarding the mitigation of impacts to the historic environment and landscape are contained within comment HE 1.18 of **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**.
Levels of Harm Assigned in the EIA Pylons East Anglia strongly disputes the levels of harm attributed by the Applicant to the heritage assets assessed within the Environmental Impact Assessment. None of the assets are identified as experiencing harm greater than "mid-level less than substantial harm", despite clear evidence in some cases of direct physical harm (such as groundworks affecting non-designated historic farmsteads or the destruction of below-ground archaeology) and significant indirect impacts on the key significances of highly graded designated assets. The distinction between low, high, or substantial harm is a matter of professional judgment, but it must be informed by a robust and comprehensive understanding of each asset's significance and setting. In our view, this has not been achieved, largely due to the deficiencies outlined above.	Levels of harm have been assessed robustly following the assessment methodology outlined in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**. The value, significance, and setting of each asset has been assessed and presented in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**. Further information regarding harm to the historic environment resulting from the Project is set out in **8.17 Response to Rule 17 Letter - Historic Environment**, submitted at Deadline 4. The Applicant fully recognises the importance of safeguarding archaeological remains of national significance, and our approach is aligned with this principle. The approach set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** and secured through Requirement 5 within **3.1 Draft Development Consent Order [REP3-004]** already includes provision for a range of mitigation strategies, including preservation in situ, should highly significant remains be identified.
Substantial Harm The National Planning Practice Guidance (NPPG) was updated on 23 July 2019 to provide additional clarification on the assessment of substantial harm. It emphasises that substantial	National Policy Statement EN-1 (2024) refers to '*Substantial harm to or loss of significance…*' and this is interpreted to mean that the level of harm to a designated heritage asset would be considerable for it to be classed as substantial harm. The threshold for substantial harm can also be defined on the basis of the Planning Practice Guidance[28] paragraph 018: '*In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building*

[28] Ministry of Housing, Communities and Local Government (2019) *Guidance: Historic environment*

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harm may arise where adverse impacts "seriously" affect a key element of an asset's special interest. The seriousness of the degree of harm to significance is therefore the critical test. While substantial harm is rightly regarded as a high threshold, Pylons East Anglia considers that there are instances within this Project where both construction and operational effects meet this test. The destruction of below-ground archaeology and the introduction of very large industrial structures into designed and non designated historic parkland are examples where the impact on significance may reasonably be regarded as substantial. Ultimately, whether substantial harm arises is a matter for the decision-maker, taking account of the specific circumstances of the case and the policies of the National Planning Policy Framework (NPPF).	*constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed.*' In Environmental Impact Assessment terms, a major (significant) effect on a designated heritage asset could be considered a guide by which to determine that the level of harm to the value of the asset would be substantial. However, as substantial harm is considered to be a high test a case-by-case assessment has been made using professional judgement. Also the assessment has not concluded any major adverse effects for historic environment. The Applicant notes that Historic England does not identify substantial harm to any relevant asset. The Applicant has assessed the Project's likely significant effects on designated and non-designated heritage assets on this case-by-case basis in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11. A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**. The assessment of harm to designated heritage assets has been assessed within **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**, which includes an assessment of harm in accordance with the EN-1 Policy framework.
Impact to Non Designated Heritage Assets Pylons East Anglia remains concerned that no meaningful assessment has been undertaken of the impacts on built Non-Designated Heritage Assets (NDHAs) located within 250 metres of the Draft Order Limits. These assets will, in our view, experience high levels of harm to their setting, and in many instances direct harm, arising from construction activity, groundworks and infrastructure located within their curtilage. The absence of assessment represents a significant methodological failure. It results in the effective exclusion of almost all built non-	This matter has been addressed in ExQ1 HE 1.38 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. In summary, all NDHAs located within the 250m study area have been assessed to determine their value. Following this an assessment was made that identified there was no chance of significant effects arising only from changes within the setting of low or negligible value non-designated heritage assets outside the Order Limits, where there is no potential for physical impact. As set out in Table 11.5 of **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** negligible value assets cannot experience a moderate or major effect and low value assets could only experience a moderate effect if a high magnitude of impact was concluded. As the nature of permanent change within setting for this Project arises from the presence of OHL this allows rural/agricultural activity around and underneath it and therefore it would not be reasonable to conclude a high magnitude of impact. Therefore, in line with NPS EN-1 the proportionate approach meant that detailed

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designated heritage assets along the route from proper consideration, despite their acknowledged local historic significance and clear susceptibility to adverse effects arising from the Project.	setting assessment would not be undertaken in these cases. Proportionality doesn't require assessment of every last asset as long as significant effects are identified, which they are. Other than in this case NDHAs have been fully assessed.
Farmstead Settings By the very nature of the rural landscape through which the proposed scheme will pass, a substantial proportion of both designated and non-designated heritage assets along the route are historic farms and farmsteads which, by their very nature, have wide ranging settings relating to their historic and functional relationship with the farmland surrounding the assets,. Pylons East Anglia considers that these relationships have been repeatedly overlooked within the Applicant's assessment. Numerous farmsteads have been scoped out on the basis that their settings do not extend to the Draft Order Limits, notwithstanding the fact that the Draft Order Limits frequently cut directly across land that has historically been integral to the operation and significance of those farmhouses. This approach demonstrates an overly simplistic and broad-brush methodology, whereby assets have been excluded from further assessment due to the presence of boundary vegetation or an assumed inward-facing orientation. Such reasoning fails to reflect the true historic and functional extent of farmstead settings and has	The Applicant has assessed the setting of assets following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** – Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)[29], utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant has considered the contribution made to assets from their historical connections to rural landscape and stands by the assessment as presented. As the respondent has not provided details as to which farmsteads they believe have settings that extend to the draft Order Limits the Applicant cannot provide further comment.

[29] Historic England (2017) *The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)*

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resulted in the inappropriate scoping out of a large number of rural heritage assets.	
Conclusion This submission demonstrates that: • a significant number of heritage assets within the PEIR and EIA have been wrongly scoped out or inadequately assessed; • impacts on setting have been systematically underestimated; • cumulative harm has not been properly addressed; and • the levels of harm assigned in the EIA are widely disputed. Pylons East Anglia respectfully requests that the Examining Authority gives appropriate weight to these concerns when considering the adequacy of the Applicant's heritage assessment and the overall balance of harm and public benefit.	The Applicant acknowledges the submission of this document, and has addressed the concluding remarks via the specific points raised in the other responses. It is important to emphasise the assessment methodology y as set out in Annex C Historic Environment Assessment Methodology of **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** was first prepared for review and discussion with relevant Statutory Environmental Bodies and Local Planning Authorities in 2022. The methodology was then reviewed following the receipt of **6.20 Scoping Opinion [APP-297]** from the Planning Inspectorate, also in 2022, and updates were made before its inclusion as Annex C in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** as a result of ongoing consultation with relevant Statutory Environmental Bodies and Local Planning Authorities and to align with the approach taken in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**. As a result, the Applicant believes the approach taken for assessment is robust, proportional, and follows relevant best practice and guidance.

Table 5.2 Applicant's Comments on Table 1 of Appendix F of the PEA Response [REP3-134]

Asset Name/ID cited in Table 1 [REP3-134]	Applicant Response
Langleys RPG (GII) 1000241	The Applicant has reviewed the assessment of the assets in light of the Respondent's comments. **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** concluded mid less than substantial harm during construction and operation to Langleys RPG. Further comments on the assessment of Langleys RPG can be found within the document **8.8.1 Applicant's Comments on Written Representations [REP2-029],** pages 82-83, in **8.8.2**

Asset Name/ID cited in Table 1 [REP3-134]	Applicant Response
	Applicant's Comments on Local Impact Reports [REP2-030], pages 411-412, and in **8.9.1 Applicant's Responses to First Written Questions[REP3-074]**, pages 306-307 (HE1.18) and pages 385-387 (HE1.36). The Applicant believes its assessment is proportional and appropriate.
Langleys (GI) 1035533, and Garden block (GII), Stables (GII) and Southa Logde (GII)	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. Langleys (1305533), and Garden block (1122115), Stables (1171617) and South Lodge (1338466) were assessed in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]. The setting of the asset Langleys is informed by its interrelationship between the elements of the high-status country estate, including non-designated buildings within the estate, its interrelationship to the village of Great Waltham and the listed buildings within, as well as the Chelmer Valley to the north and east, with designed views from the house to the east-north-east. The setting of the Langleys makes a considerable contribution to its value and does extend to the Order Limits. The setting of the Garden block (1122115) and Stables (1171617) '... *is more insular and restricted to their location within the grounds of the house and the parkland beyond. The setting of these assets, therefore, makes a considerable contribution to their values, but due to its more insular nature, the setting does not extend to the Order Limits*. ' (**6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]. page 891**). The setting of the South Lodge (1338466) is informed by '...*its location at the entrance to the estate ...the setting of the asset has been encroached upon by the modern development of Great Waltham to the south....the setting of the lodge, therefore, makes a moderate contribution to its value, but due to its focus on the estate and its restricted roadside nature, the setting does not extend to the Order Limits.*' (**6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]. page 891**). The assets whose settings extend to the OL were assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** . During the operation phase, the Project would be impact the assets whose setting extends to the Order Limits through the introduction of pylons within the landscape beyond the parkland and as a result this would result in the asset experiencing a Lower Less Than Substantial Harm.

Asset Name/ID cited in Table 1 [REP3-134]	Applicant Response
	It is acknowledged that these assets to gain considerable and moderate value respectively from their settings, and that only the setting of the Langleys extends to the Order Limits. These conclusions were informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] - Annex C**. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate. Further comments on the assessment can be found within the document **8.8.1 Applicant's Comments on Written Representations [REP2-029]** pages 82-84**.**
Ingatestone Hall (GI) 1187315, Gatehouse and garden walls, Granary (GII*) and the GII Lodge Cottages, Barn, Shelter shed and attached byre, Cistern House, Garden walls	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. Ingatestone Hall (1187315), Granary (1298752), Gatehouse and courtyard (1197286) two Barns (1187269) and (1297189), Byre (1197287), Shelter and Shed (1197288), Lodge Cottages (1187393) Cistern House (1187282) and Garden Walls (1187300) and (1297190) were assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**. '*The setting of the Ingatestone Hall complex is shared and informed by the interrelationships between the designated assets and by their relationships with the associated non-designated outbuildings .... The setting is further informed by the surrounding quiet rural agricultural landscape with which the assets and the non-designated associated outbuildings have a historical and functional relationship...*'*The setting of the assets, therefore, makes a considerable contribution to their values and except for the two garden walls (1187300, 1297190) and the cistern house (1187282), whose settings are restricted to the confines of the Ingatestone Hall complex, the shared setting of the remaining listed buildings... extends to the Order Limits*'. (**6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]. page 974**). The assets whose settings extend to the OL were assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** . During the operation phase, the Project would be partially within the setting of those assets which extend to the OL. The

Asset Name/ID cited in Table 1 [REP3-134]	Applicant Response
	project is located along the limits of their setting and would be partially screened by vegetation, making the project occasionally visible. As such, the assets would experience Lower Less Than Substantial Harm. It is acknowledged that the assets settings contribute considerably to their value, with all but three of the assets listed above having setting which extend to the Order Limits. This conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] - Annex C**. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate. For further comments regarding the assessment, please see the Applicant's response to **[REP1-191] in 8.8.1 Applicant's Comments on Written Representations [REP2-031]**.
Margaretting Hall (GII) 1152104	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. Margaretting Hall (1152104) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] page 969**. The assessment of setting and impacts have been informed by site visits, aerial and street-view imagery. The Applicant acknowledges that the setting of this asset is informed by the surrounding agricultural land with which the asset and its outbuildings have a historical and functional relationship. The Applicant also agrees that the pylons and wires would be visible from the asset, with the closest located c. 400 m west. The Applicant, however, disagrees with the respondent's assessment that a 'high order of mid-level high less than substantial harm' should be applied. The methodology by which the Applicant's conclusion of mid less than substantial harm is recorded in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** presenting three categories of less than substantial harm with no further subdivisions. The Applicant is satisfied that the Project would not constitute upper less than substantial harm as defined in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** and,

Asset Name/ID cited in Table 1 [REP3-134]	Applicant Response
	therefore, that the conclusions reached **in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**, of moderate adverse significance of effect and **in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** of mid less than substantial harm, are proportionate and appropriate. For further comments regarding the mitigation considered for this asset, please see the Applicant's response to HE 1.36 **in 8.9.1 Applicant's Responses to First Written Questions [REP3-074].**
Church of St Mary, Buttsbury (GII*) 1264434	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. Church of St Mary, Buttsbury (1264434) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**. The setting of the asset is informed by its isolated location, on the edge of Ingatestone, set within a churchyard surrounded by an agricultural landscape with which it shares a historical functional relationship with. The loss of the settlement which the church once served detracts from the setting however. The asset is acknowledged to gain **moderate** value from its setting, which does extend to the Order Limits. This conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] - Annex C**. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The assets were assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** - *'The operation phase of the Project would impact the asset's setting through the introduction of pylons TB190-196. The pylons would be visible from the asset, and they would alter the character of the rural setting of the asset. It is concluded, therefore, that the asset would experience Mid Less Than Substantial Harm*'.

Asset Name/ID cited in Table 1 [REP3-134]	Applicant Response
	The Applicant believes its assessment is proportional and appropriate. Further comments on the assessment can be found within **REP1-191 8.8.1 Applicant's Comments on Written Representations [REP2-029]** page 87-88**.**
Langleys RPG (GII) 1000241	The Applicant has reviewed the assessment of the assets in light of the Respondent's comments. **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** concluded mid less than substantial harm during construction and operation to Langleys RPG. Further comments on the assessment of Langleys RPG can be found within the document **8.8.1 Applicant's Comments on Written Representations [REP2-029],** pages 82-83, in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030],** pages 411-412, and in **8.9.1 Applicant's Responses to First Written Questions[REP3-074]**, pages 306-307 (HE1.18) and pages 385-387 (HE1.36). The Applicant believes its assessment is proportional and appropriate.
Church of All Saints, Tibbenham (GI) 1049992	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. Church of All Saints, Tibbenham (1049992) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**. The setting of the asset is ' *informed by its location within a working farm complex and by its relationship with its non-designated outbuildings, most of which are recorded on the first edition OS map of 1881.The setting is further informed by the long established Great Eastern Railway 180 m to the south-east and by the surrounding agricultural land with which the asset and its outbuildings have a historical and functional relationship*'. (**6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]. page 969**). Therefore, its setting makes a considerable contribution to its value, and due to proximity the setting does extend to the Order Limits. Although the asset is acknowledged to gain considerable value from its setting, it does not extend to the Order Limits. This conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] - Annex C**. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the ‘five-step’ approach given in part 2 of the

Asset Name/ID cited in Table 1 [REP3-134]	Applicant Response
	good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate. Further comments on the assessment can be found within the document **8.9.1 Applicant's Responses to First Written Questions [REP3-074] - HE 1.18**.
Manor Farmhouse Tibbenham 1049998 and NDHA farmstead	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. Manor Farmhouse (1049998) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**. The setting of the asset is informed by its agricultural landscape with which the asset shares a historical functional relationship with and associated farm buildings. However, twentieth century development has encroached upon the setting ad change in function of some of the outbuildings has also detracted from the setting. The asset is acknowledged to gain moderate value from its setting, which does extend to the Order Limits. This conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] - Annex C**. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The assets were assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** - The operation phase would introduce pylons close to the asset which would impact the rural setting associated with the asset. However, there is some mature tree screening and intervene outbuildings which would interrupt views from the asset towards the Project. As such the asset would experience Mid Less Than Substantial Harm. The Applicant believes its assessment is proportional and appropriate. Further comments on the assessment can be found within the document **8.8.1 Applicant's Comments on Written Representations [REP2-029].** Regarding the NDHA asset mentioned in the

Asset Name/ID cited in Table 1 [REP3-134]	Applicant Response
	comment, please could the ID number for this asset be provided so that we can ensure we can provide an answer to the comment in full.
Roydon Hall (GII*) 1373311 and barn (GII*) and garden wall (GII) together with farm buildings and moat (NDHAs)	The Applicant acknowledges the comment from the Respondent. However, the comment is not sufficiently clear due to incorrect asset ID's and two separate viewpoint locations from different areas being provided. Please could the respondent provide clarification so that a response can be provided.
Creeting Hall (GII*) 1352073	The matter concerning the assessment of Creeting Hall (1352073) has already been addressed. please see the Applicant's response in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** to HE 1.36 - Pages 347-348, HE1.13 - pages 289-291, LV1.11 - pages 520-521, and REP1-191 (**8.8.1 Applicant's Comments on Written Representations**) pages 74-75.
Monk's Farm Cottages (GII) 1171147	The Applicant has reviewed the assessment of Monk's Farm Cottages (1171147) in light of the Respondent's comments. **6.11 Environmental Statement Chapter 11- Historic Environment [AS 068]** provides an assessment of the Project's impact on the Grade II listed asset. The assessment has considered how change in the setting of the asset would affect its value, in accordance with **6.19 Scoping Report [APP-288 – APP-296], 6.20 Scoping Opinion [APP-297]** and the methodology set out in **6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]**, which aligns with relevant heritage guidance. The Applicant considers these assessments to be appropriate for the reasons set out in the assessments **-6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**, and in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**. Heritage visualisations have been used to inform assessment of heritage assets, in combination with relevant landscape and visual viewpoints, site visits to undertake setting assessment, and information from the sources set out in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**. Viewpoint photography and visualisations are not required by the specialist setting assessment guidance (Historic England (2017) The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)) but they are noted as one of the tools to assist in assessment.

Asset Name/ID cited in Table 1 [REP3-134]	Applicant Response
	The Applicant believes its assessment is proportional and appropriate. For further comments regarding the asset please see response HE 1.19 (**8.9.1 Applicant's Responses to First Written Questions [REP3-074])**, pages 308-309. The Applicant believes its assessment is proportional and appropriate.
Feeringbury Manor (GII*) 1306710 and outbuilding, barn and waterwheel (GII)	The Applicant notes the comment regarding Feeringbury Manor (1306710) and the designated and non-designated assets associated with the Manor. This raised issue has been addressed in the paragraph REP1-191 (**8.8.1 Applicant's Comments on Written Representations**), pages 78-79. Please also see further comments in HE 1.15 (**8.9.1 Applicant's Responses to First Written Questions [REP3-074]**, pages 292-294.
Church of All Saints, Tibbenham (GI) 1049992	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. Church of All Saints, Tibbenham (1049992) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**. The setting of the asset is ' *informed by its location within a working farm complex and by its relationship with its non-designated outbuildings, most of which are recorded on the first edition OS map of 1881.The setting is further informed by the long established Great Eastern Railway 180 m to the south-east and by the surrounding agricultural land with which the asset and its outbuildings have a historical and functional relationship*'. (**6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]. page 969**). Therefore, its setting makes a considerable contribution to its value, and due to proximity the setting does extend to the Order Limits. Although the asset is acknowledged to gain considerable value from its setting, it does not extend to the Order Limits. This conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] - Annex C**. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the ‘five-step’ approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment.

Asset Name/ID cited in Table 1 [REP3-134]	Applicant Response
	The Applicant believes its assessment is proportional and appropriate. Further comments on the assessment can be found within the document **8.9.1 Applicant's Responses to First Written Questions [REP3-074] - HE 1.18**.
Mendlesham Hall (GII) 1180527	The Applicant notes the comment regarding Mendlesham Hall. **6.11 Environmental Statement Chapter 11- Historic Environment [AS 068]** provides an assessment of the Project's impact on the Grade II listed hall. The assessment has considered how change in the setting of the asset would affect its value, in accordance with **6.19 Scoping Report [APP-288 – APP-296], 6.20 Scoping Opinion [APP-297]** and the methodology set out in **6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]**, which aligns with relevant heritage guidance. The Applicant considers these assessments to be appropriate for the reasons set out in the assessments -**6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**, and in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**. Heritage visualisations have been used to inform assessment of heritage assets, in combination with relevant landscape and visual viewpoints, site visits to undertake setting assessment, and information from the sources set out in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**. Viewpoint photography and visualisations are not required by the specialist setting assessment guidance (Historic England (2017) The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)) but they are noted as one of the tools to assist in assessment.
Flordon Hall (GII*), and Piggery (Dower House) & Barn and estate grounds (NDHA) 1050698	As described in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** the intervening landscape between the asset and Project includes buildings, copses, and mature tree-lined hedgerows that would interrupt and break up the views from the asset towards the Project. The principal elevation of the asset faces east, and views eastwards would not include or be impacted by the Project. Nor would the Project impact the asset's relationship and intervisibility with the Farmstead and its two Grade II listed elements (Piggery 60 Yards South of Flordon Hall (1172231) and Barn to Flordon Hall (1373055)). The asset can be viewed from Long Lane c. 480 m to the south-east, and this view would potentially include the top of pylons RG21 and RG22 cresting above mature tree-lined hedgerows and copses to the north-west of the asset.

Asset Name/ID cited in Table 1 [REP3-134]	Applicant Response
	The setting of heritage assets is informed by walkover surveys undertaken in Annex D, but also aerial and street-view imagery, and viewpoint assessment. The assessment for these assets includes historical Viewpoint HE1 to the east of Flordon Hall, giving a view to the front of the hall with the Project behind. - **7.12 Visualisations - Part 8 of 9 [APP350]**. The Applicant is, therefore, confident in its assessment that the Project would cause a low adverse magnitude of impact prior to mitigation resulting in a direct, permanent moderate adverse significance of effect (significant). The Applicant is also confident in its conclusion that the asset would experience Mid Less Than Substantial Harm. In its written representation **[REP1-191]**, Historic England, statutory heritage advisor to the Secretary of State, agrees with the Applicant's assessment of Flordon Hall. With regard to the piggery and the barn, whilst many of the elements of the setting of the hall are shared with these assets, the Applicant considers their settings to be more integral to the Flordon Hall complex with the wider agricultural landscape not as prominent an element of their settings as it is for the hall.
'Gunn's Farmhouse' (GII) (1262659) and Barn (GII) (1251600)	The Applicant notes the comment regarding Gunn's Farmhouse and Barn. **6.11 Environmental Statement Chapter 11- Historic Environment [AS 068]** provides an assessment of the Project's impact on the Grade II listed farmhouse and barn. The assessment has considered how change in the setting of the asset would affect its value, in accordance with **6.19 Scoping Report [APP-288 – APP-296], 6.20 Scoping Opinion [APP-297]** and the methodology set out in **6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]**, which aligns with relevant heritage guidance. The Applicant considers these assessments to be proportional and appropriate for the reasons set out in the assessments **-6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**, and in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**.
'The Grindle House' (GII) (1372456) and 'Gunn Farm Farmstead' (2476) NDHA	The Applicant notes the comment regarding The Grindle House and Gunn farm Farmstead. **6.11 Environmental Statement Chapter 11- Historic Environment [AS 068]** provides an assessment of the Project's impact on the Grade II listed house and NDHA farmstead. The assessment has considered how change in the setting of the asset would affect its value, in accordance with **6.19 Scoping Report [APP-288 – APP-296], 6.20 Scoping Opinion**

Asset Name/ID cited in Table 1 [REP3-134]	Applicant Response
	[APP-297] and the methodology set out in **6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]**, which aligns with relevant heritage guidance. The Applicant considers these assessments to be proportional and appropriate for the reasons set out in the assessments **-6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**, and in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**.
'Bleak Hall' (GII) (1251669)	The Applicant notes the comment regarding Bleak Hall. **6.11 Environmental Statement Chapter 11- Historic Environment [AS 068]** provides an assessment of the Project's impact on the Grade II listed hall. The assessment has considered how change in the setting of the asset would affect its value, in accordance with **6.19 Scoping Report [APP-288 – APP-296], 6.20 Scoping Opinion [APP-297]** and the methodology set out in **6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]**, which aligns with relevant heritage guidance. The Applicant considers these assessments to be proportional and appropriate for the reasons set out in the assessments **-6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**, and in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**. With regard to Bleak Hall, please see the Applicant's response to **HE 1.18** and **HE1.36** (**8.9.1 Applicant's Responses to First Written Questions [REP3-074]**), pages 296-307 and 349-350.
Bleak Hall Farmstead (2474) NDHA	The Applicant has reviewed the assessment of Bleak Hall Farmstead (2474) in light of the Respondent's comments . The Applicant notes that this asset has been assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209**] and **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**. The assessment has be done in accordance with **6.19 Scoping Report [APP-288 – APP-296], 6.20 Scoping Opinion [APP-297]** and the methodology set out in **6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]**, which aligns with relevant heritage guidance. The Applicant notes that during the construction phase, the farm buildings will not be physically impacted. As set out in the assessment discussed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070],** during

Asset Name/ID cited in Table 1 [REP3-134]	Applicant Response
	this phase, as a very small proportion of the land around the buildings, is located within the Order Limits, *'the magnitude of impact is considered to be low adverse*'. Therefore, the Applicant disagrees that the level of potential impact that may occur as a result of physical groundworks during the construction phase of the scheme will result in a High Level of Less that Substantial Harm and is confident that its conclusions are appropriate.
Little Hyde Farmhouse (GII)1197304 and Little Hyde Farm Cottages (GII) 1207659	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. Little Hyde Farmhouse (1197304) and Little Hyde Farm Cottages (1207659) were assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209].** The setting of the asset is informed by its agricultural landscape with which the asset shares a historical functional relationship with and associated farm buildings. However, twentieth century development has encroached upon the setting ad change in function of some of the outbuildings has also detracted from the setting. The Applicant notes the comment regarding Little Hyde Farmhouse and Little Hyde Farm Cottages. **6.11 Environmental Statement Chapter 11- Historic Environment [AS 068]** provides an assessment of the Project's impact on the Grade II Little Hyde Farmhouse and Little Hyde Farm Cottages. The assessment has considered how change in the setting of the asset would affect its value, in accordance with **6.19 Scoping Report [APP-288 – APP-296], 6.20 Scoping Opinion [APP-297]** and the methodology set out in **6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]**, which aligns with relevant heritage guidance. The Applicant considers these assessments to be appropriate and proportional for the reasons set out in the assessments **-6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**, and in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**. The operation phase would introduce pylons partially within the setting of the assets, however there would be partial screening by mature vegetation and as such the Project would be occasionally visible resulting in a Lower Less Than Substantial Harm. Heritage visualisations have been used to inform assessment of heritage assets, in combination with relevant landscape and visual viewpoints, site visits to undertake setting assessment, and information from the sources set out in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**. Viewpoint photography and visualisations

Asset Name/ID cited in Table 1 [REP3-134]	Applicant Response
	are not required by the specialist setting assessment guidance (Historic England (2017) The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)) but they are noted as one of the tools to assist in assessment. The Applicant believes its assessment is proportional and appropriate.
Wyfields Farmhouse 1337057 and Barn to 1111646 (GII)	The Applicant has reviewed the assessment of Wyfields Farmhouse (1337057) and Barn to north of Wyfields Farmhouse (1111646) in light of the Respondent's comments. The Applicant acknowledges that views west from within the asset's grounds could include wires and pylon tops. The Applicant, however, disagrees that the adverse impact on the assets caused by the Project could be at the high level of less than substantial harm as the Project does not lessen the understanding of the asset as the heart of a working farm complex. Nor does the Project diminish the relationships the assets have with each other and the other elements of the farm complex, and which positively contribute to the contribution the setting makes to the asset's value. The Applicant is therefore satisfied that the conclusions reached in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070],** of moderate adverse significance of effect and in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** of mid less than substantial harm are appropriate. The Applicant, therefore, proposes to make no changes to the assessment. Also, where a mid-level less than substantial harm conclusion has been reached for the operation (and maintenance) phase impacts on designated assets in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**, the mitigation provided, or the reason for not providing mitigation, is described for each of these two designated heritage assets with this assessment in **HE1.36 (8.9.1 Applicant's Responses to First Written Questions [REP3-074])**, pages 398-402.
Botney Hill Farmhouse (GII) 1322862	The Applicant notes the comment regarding Botney Hill Farmhouse (1322862). The Applicant has reviewed the assessment of this assets in light of the respondent's comments. The asset was assessed in **6.11.A1 Environmental Statement Appendix 11.1**

Asset Name/ID cited in Table 1 [REP3-134]	Applicant Response
	- Historic Environment Baseline Report [APP-209] - 3.8.252-253 which identified that the setting of the asset is informed by its position within a farmyard, set by back from busy road within a rural location. The setting of the asset makes a considerable contribution to its value. This setting does extend to the Order Limits which is close to the asset. The Listed Building was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] pages 305-306 and 1209-1210** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] page 186** and **336**. The Project would result in a moderate change to the setting of the asset resulting in a medium impact on its value. It is concluded, therefore, that the asset would experience Mid Less Than Substantial Harm. . This conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] - Annex C, 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] page 186** and **336**. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment (see **7.12 Visualisations - Part 9 of 9 [APP-351] Viewpoint HE42**). The Applicant believes its assessment is proportional and appropriate.
Moor Hall (GII*)1237175	The Applicant notes the comment regarding Moor Hall (1237175). The Applicant has reviewed the assessment of this assets in light of the respondent's comments. The asset was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] -868** which identified that the setting of the asset is informed by its very rural position, not located close to any settlement. The asset is set within its own yard with associated outbuildings surrounded by rural farmland. The setting of the asset makes a considerable contribution to its value. This setting does extend to the Order Limits due to proximity of the Order Limits and the elevated terrain that the asset is situation upon. The Listed Building was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] pages**

Asset Name/ID cited in Table 1 [REP3-134]	Applicant Response
	247-248 and 1167 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] page 155** and **308**. The Project would result in a minor adverse significance of effect to the asset and that the asset would experience Lower Less Than Substantial Harm. . This conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] - Annex C, 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] page 155 and 308**. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment (see **7.12 Visualisations - Part 9 of 9 [APP-351] Viewpoint HE40**). The Applicant believes its assessment is proportional and appropriate.
'Bullenhall Farmhouse' (GII) (1033263) and 'Bullenhall Farm Farmstead' (2436) NDHA	The Applicant notes the comment regarding Bullenhall Farmhouse (1033263) and Bullenhall Farm Farmstead (2436) NDHA. The Applicant has reviewed the assessment of this assets in light of the respondent's comments. The asset was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] pages 489-90**, which identified that the setting of the assets are informed by their interrelationship as well that the historical functional relationship between the assets that the surrounding rural and agricultural landscape. The setting of the asses makes a considerable contribution to their value. Their setting does extend to the Order Limits. The Listed Building and NDHA were assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] pages 89-80, 1067 and 628, 1450** and the Listed Buildings within **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] page 68-69 and 244-255**. The Project would result in a negligible adverse significance of effect to the assets during the operational phase and the Listed Building would experience Lower Less Than Substantial Harm.

Asset Name/ID cited in Table 1 [REP3-134]	Applicant Response
	This conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] - Annex C, 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The Applicant believes its assessment is proportional and appropriate.
'Canes Farmhouse' (GII) (1036949) and 'Canes Farmstead' (3052) NDHA	The Applicant notes the comment regarding Canes Farmhouse and Canes Farmstead, which were both assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] -** *The setting of Canes Farmhouse is informed by its location in a farmyard and by its historical relationship with the surviving non-designated elements of the Cane's Farm farmstead...The setting is further characterised by the surrounding agricultural landscape with which the asset has historical and former* *functional relationships.* Whilst it is acknowledged that their setting makes a considerable contribution to their value, this setting is restricted to the farmyard and immediate agricultural landscape and as such does not extend to the Order Limits. This conclusion was informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] - Annex C**. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. Therefore, the Applicant believes its assessment is proportional and appropriate.
'Fenn Farmhouse' Burstall (GII) (1351617)	The Applicant notes the comment regarding Fenn Farmhouse (1351617). The Applicant has reviewed the assessment of this assets in light of the respondent's comments. The asset was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic**

Asset Name/ID cited in Table 1 [REP3-134]	Applicant Response
	Environment Baseline Report [APP-209] page 539, which identified that the setting of the asset is informed by its position within Fen Farm Farmstead (NDHA) and the historical functional relationship the assets shares with the farmstead and the surrounding agricultural land. The busy road detracts from the setting of the asset slightly but provides a level of understanding to the placement of the farm. The setting of the asses makes a considerable contribution to its value. The setting does extend to the Order Limits. The Listed Building was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] pages 135-136, 666, 1095, 1473** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] page 91 and 260**. The Project would result in a minor adverse significance of effect to the Listed Building and negligible adverse significance of effect to the NDHA during the operational phase and the Listed Building would experience Lower Less Than Substantial Harm. This conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] - Annex C, 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The Applicant believes its assessment is proportional and appropriate.
'The Grange' (GII) (1194480)	The Applicant has reviewed the assessment of The Grange (1194480) in light of the respondent's comments. It was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] -** The setting of the asset is informed by it position, set back from the road in property grounds which are enclosed by well-established hedges. The setting of the asset is also informed by its association with the NDHA Washbrook Street (**3160**). The wider setting surrounding the asset comprises a mixture of rural and agricultural fields but does not extend beyond Belstead Brook to the east. Therefore, the setting does not extend to the Order Limits. This conclusion was informed by following best practice and guidance as per the assessment methodology in

Asset Name/ID cited in Table 1 [REP3-134]	Applicant Response
	6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery. Therefore, the Applicant believes its assessment is proportional and appropriate.
Washbrook Street (3160) NDHA	All non-designated heritage assets (NDHA) were assessed to determine their value in accordance with **6.19 Scoping Report [APP-288 – APP-296], 6.20 Scoping Opinion [APP-297]** and the methodology set out in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**. Those assets assessed to have a low or negligible value and located outside the Order Limits did not have a settings assessment undertaken. As they would not experience physical impacts, there is no potential for significant effects as a result of change to setting for assets of these values. While some harm would still be possible, given their value and the nature of potential impacts, this would be at the very lowest end of the harm scale. NPS EN-1 (2024) paragraph 5.9.9 includes instructions regarding the Applicant's assessment 'The applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe these along with how the mitigation hierarchy has been applied in the ES' and in several places refers to detail being proportionate to the importance/significance of the heritage asset. The Applicant therefore considers that the Project has appropriately complied with relevant policy in NPS EN-1 (2024) regarding assessment of impacts to non-designated heritage assets. A number of locally listed buildings assessed to be medium value were subject to detailed assessment of potential impact through change to setting, following the same approach as for designated assets of medium and high value. Whilst heritage visualisations have been used to inform assessment of some heritage assets, mainly those of medium value or higher, visualisations are not produced for every heritage asset. Viewpoint photography and visualisations are not required by the specialist setting assessment guidance (Historic England (2017) The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)) but they are noted as one of the tools to assist in assessment where they are agreed to be of use.

Asset Name/ID cited in Table 1 [REP3-134]	Applicant Response
	As this asset is not of medium or higher values it was not included in the list of agreed visualisations.
'St James's Church', (GI) (1224521)	The Applicant notes the comment regarding St James's Church (1224521). The Applicant has reviewed the assessment of this assets in light of the respondent's comments. The asset was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] page 690**, which identified that the setting of the asset is informed by its rural location, positioned within its churchyard, which is surrounded by some high trees. The wider environment is largely rural with some residential areas. The setting of the asset makes a considerable contribution to its value. The setting does extend to the Order Limits. The Listed Building was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] pages 151 and 1105** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] page 98 and 265**. The Project would result in a minor adverse significance of effect to the asset and the Listed Building would experience Lower Less Than Substantial Harm. This conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] - Annex C, 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215].** This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The Applicant believes its assessment is proportional and appropriate.
'Mott's Farmhouse' (GII) (1266736) and Motts Farmstead (4214) NDHA	The Applicant notes the comment regarding Mott's Farmhouse (1266736). The Applicant has reviewed the assessment of this assets in light of the respondent's comments. The asset was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] page 693-4**, which identified that the setting of the asset is informed by the interrelationship between asset and the other listed assets within the farm. The setting is further informed by the secluded rural environment. The

Asset Name/ID cited in Table 1 [REP3-134]	Applicant Response
	setting of the asset makes a considerable contribution to its value. The setting does extend to the Order Limits. The Listed Building was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] pages 174-175, 1119-1120** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] page 110 and 274**. The Project would result in a no change impact to the asset during operation, with No Harm expected during the operational phase. This conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] - Annex C, 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215].** This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The Applicant believes its assessment is proportional and appropriate. The Applicant has not assessed the non-designated asset Wick House due to its distance outside the Order Limits and the Study Area agreed with consultees within the scoping report, see **6.19 Scoping Report - including appendices B to K [APP-296]**.
Godbolts Farmhouse', Marks Tey (GII) (1224528) and Godbolts farmstead (4215) NDHA	The Applicant notes the comment regarding Godbolts Farmhouse and Godbolts farmstead, which were both assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] -** The setting of the asset is shared and as such are informed by their relationship between each other, as well as their proximity to a potential DMV (**4058**). The road side location and wider agricultural landscape with which the assets shares a historical functional relationship with also contributes to their setting. However, the modern development close to the asset have impacted their setting and value. It is because of this that the setting of the assets makes a minor contribution to their value and the setting does not extend to the Order Limits, despite the potential for some intervening views. This conclusion was informed by following best practice and guidance as per the

Asset Name/ID cited in Table 1 [REP3-134]	Applicant Response
	assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] - Annex C**. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. Therefore, the Applicant believes its assessment is proportional and appropriate.
Knaves Farmhouse (GII) (1266775), barn and range (GII) and Knaves Farm (4217) NDHA	The list entry number for Knaves Farmhouse listed building is 1266773 and Range South of Barn to South of Knaves Farmhouse is 1266775. Applicant has reviewed the assessment of the assets in light of the Respondent's comments. The Applicant acknowledges that views north east to north west from within the asset's grounds could include wires and pylon tops. The Applicant, however, disagrees that the adverse impact on the asset caused by the Project could be at the high level of less than substantial harm as the Project does not lessen the understanding of the assets as the heart of a farm complex. Nor does the Project diminish the relationships the assets have with each other and with the non-designated element of the farm complex, and which positively contribute to the contribution the setting makes to the assets value. The Applicant also confirm that the non designated Knaves Farm, Marks Tey (4217) has been assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** and **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** pages 799-800 and 1579. Moreover, in **8.9.1 Applicant's Responses to First Written Questions [REP3-074],** the Applicant gives more details about the assessment of these assets and notes that the assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment (including baseline photo 4.23, Great Tey Road, located c.230 m south, that is representative of people living, moving and using the local road network near Little Tey - **7.12 Visualisations - Part 5 of 9 [APP-347]**). The Applicant is therefore satisfied that the conclusions for the operation phase for the assets reached in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**, of moderate adverse significance of effect and in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** of mid less than substantial harm are appropriate. The Applicant, therefore, proposes to make no changes to the assessment.

Asset Name/ID cited in Table 1 [REP3-134]	Applicant Response
Newneys Farmhouse (GII*)1123450 and Associated Barn (GII) 1337819	The matter concerning the assessment of Newneys Farmhouse and associated barn has already been addressed. Please see comment REP1-191 of **8.8.1 Applicant's Comments on Written Representations [REP2-029]**, page 81.
'Little Tey House' (GII) (1266823) and 'Barn To South West Of Little Tey House' (GII*) (1266779)	The Applicant notes the comment regarding Little Tey House (1266823). The Applicant has reviewed the assessment of this assets in light of the respondent's comments. The asset was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.5.417 - 18 which identified that it drew significance from the relationship with the barn and was further informed by the surrounding agricultural landscape with which the assets have a functional and historical relationship. The setting of the asset makes a considerable contribution to its value. This setting does extend to the Order Limits which is close to them. The Listed Building was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** pages 177-178 and 1122 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** pages 112-113 and 276-277. The Project would result in a moderate change to the setting of the asset resulting in a medium impact on its value. It is concluded, therefore, that the asset would experience Mid Less Than Substantial Harm. . This conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment (see **7.12 Visualisations - Part 9 of 9 [APP-351]** Viewpoint HE27). The matter concerning the assessment of the Barn to the Southwest of Little Tey House (1266779) has already been addressed. Please see comment REP1-191 of **8.8.1**

Asset Name/ID cited in Table 1 [REP3-134]	Applicant Response
	Applicant's Comments on Written Representations [REP2-029], page 77-78. The Applicant believes its assessment is proportional and appropriate.
Teybrook Farmhouse' (1223156), Garden wall, stables and 2 barns, (GII) and Teybrook Farmyard (4225) NDHA	The Applicant has reviewed the assessment of the assets in light of the Respondent's comments. The Applicant notes there are seven listed building with the Teybrook Farm (4225) including the Granary (1223157) and the 'Barn to east of Teybrook Farmhouse' (1223158) but also the post medieval 'Stables To South Of Teybrook Farmhouse' (1267423), the post medieval 'Barn To South East Of Teybrook Farmhouse' (1267424), the post medieval 'Teybrook Farmhouse' (1223156), the post medieval 'Barn To Rear Of Stables At Teybrook Farm' (1267422), and the post medieval 'Garden Wall At Teybrook Farm' (1223159). The Applicant disagree that the assets were scoped out as the setting was assessed as not extending to the DOL. All the assets were assessed within **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** and **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** as well as **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** for the listed buildings. The Applicant concluded that the setting of these assets does extend to the Order Limits. The Applicant notes that due to the distance and mature vegetation between the assets and the pylons, the views to the pylons would be limited, the closest pylon being located 550 m south-east. The Applicant is therefore satisfied that the conclusions reached in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** and in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** are appropriate. The Applicant, therefore, proposes to make no changes to the assessment.
'Bragg' (1267411) (GII)	The Applicant has reviewed the assessment of 'Bragg' (1267411) in light of the Respondent's comments. The Applicant acknowledges that wires and top of pylons in the distance may potentially be seen from this asset, with the closest pylon located c. 250m north-east. However, the Applicant disagrees that this asset would experience a High Less Than Substantial Harm given the intervisibility between the asset and the development due to the buildings and mature vegetation, and notes that the rural landscape will remain in place beneath and around the proposed overhead line. Therefore, the Applicant considers the assessment undertaken within **6.11.A2 Environmental Statement Appendix 11.2 -**

Asset Name/ID cited in Table 1 [REP3-134]	Applicant Response
	Historic Environment Assessment Tables [AS-070] and in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** is proportionate and appropriate.
Great Warley Hall (GII) 1123449 and two barns (GII), and a Moated Site NDHA	The Applicant has reviewed the assessment of 'Great Warley Hall' (1123449), 'Barn Approximately 40 m West South-West of Great Warley Hall' (1248834), 'Barn Approximately 40 m South-West of Great Warley Hall' (1337818) and the manorial site (5020), which also includes the remains of a small moat, in light of the Respondent's comments. The Applicant acknowledges that wires and top of pylons in the distance may potentially be seen from this asset, with the closest pylon located c. 380m south. However, the Applicant disagrees that these assets would experience a High Less Than Substantial Harm given the intervisibility between the asset and the development due to mature vegetation, and notes that the Project does not diminish the relationships the assets have with each other and with the non-designated element of the complex, and which positively contribute to the contribution the setting makes to the assets value. The Applicant also notes that the rural landscape will remain in place beneath and around the proposed overhead line. Therefore, the Applicant considers the assessment undertaken within **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** and in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** is proportionate and appropriate.
Westocks Farmhouse (GII) 1168106 and outbuildings and Granary (GII)	The Applicant has reviewed the assessment of Westocks Farmhouse (1168106), Farm Outbuilding Approximately 10 m East of Westcocks Farmhouse' (1122745) and Granary Approximately 20 m South of Westcocks Farmhouse' (1168121) in light of the Respondent's comments. The matter concerning the assessment of Westcocks Farmhouse and associated barn, as well as route modifications of the overhead line lines and western CSE has already been addressed. Please see comment **HE1.14 (8.9.1 Applicant's Responses to First Written Questions [REP3-074]**).
Elm Farmhouse (GII) 1373558 and outbuildings (NDHAs)	The Applicant notes the comment regarding Elm Farmhouse (1373558).The Applicant has reviewed the assessment of this assets in light of the respondent's comments. It concluded that the setting of the asset is informed by its agricultural and rural setting with which the asset has historical and functional relationships **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.8.574 and

Asset Name/ID cited in Table 1 [REP3-134]	Applicant Response
	3.8.575. The setting of the asset makes a considerable contribution to its value and because of the proximity of the Order Limits the setting does extend to them. The Listed Building was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** pages 31 and 1026 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** pages 26-27 and 216. The Project would impact the views of the agricultural landscape to the north-north-west (RG28) as the pylon would be visible above the hedgerow which defines the asset's garden, and to the south-west where pylon RG29 is located c. 220 m away. The Project would result in a moderate change to the setting of the asset resulting in a medium impact on its value. It is concluded, therefore, that the asset would experience Mid Less Than Substantial Harm. This conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment (see **7.12 Visualisations - Part 9 of 9 [APP-351]** Viewpoint HE21). As outlined in page 463 of **8.4.1 Applicant's Comments on Relevant Representations [REP2-023]** the applicant believes its assessment to be appropriate for this asset.
Dunton Hall (GII) 1338380, Moat NDHA and DMV NDHA	The Applicant notes the comment regarding the Church of Dunton Hall (1338380).The Applicant has reviewed the assessment of this assets in light of the respondent's comments. The asset was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.8.275 and 3.8.276 which determined that the proximity of the Order Limits to the asset and the open environment surrounding it [...], means that there would be visibility between them and the Order Limits. Because of this proximity and intervisibility the setting of the asset does extend to the Order Limits. The Listed Building was assessed in **6.11.A2 Environmental Statement Appendix**

Asset Name/ID cited in Table 1 [REP3-134]	Applicant Response
	11.2 - Historic Environment Assessment Tables [AS-070] pages 310-311 and 1213 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** pages 188 and 338-339. The current plan would remove the 132 kV PSC2-10 pylons and replace them with fewer taller 400 kV pylons. The Project would impact the asset's setting through the addition of pylons TB228-TB231 c. 200 m to the north-west, west and southwest. It is concluded, therefore, that the asset would experience Mid Less Than Substantial Harm. Response 6.21 of the **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** page 432, provides additional comment on the change of setting, alongside a comment on page 166 of **8.4.1 Applicant's Comments on Relevant Representations [REP2-023]**. Both the nearby Moat (7016) and possible DMV (7017) were identified to be medium value and also had their setting assessed **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** 3.8.138-139 . The setting of both of these assets are shared and informed by their interrelationship as potential contemporary elements of a medieval landscape and by their relationship with the Grade II listed hall and church just to the south. The setting of the assets makes a minor contribution to their values and extends to the order limits. **These assets were assessed in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** pages 947-948. 965-966, 1735, 1747. The development would change the setting of assets with the presence of pylons TB227-231. As both are medium value assets receiving a low adverse impact they were concluded to have a permanent minor adverse effect. This conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the ‘five-step’ approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment (see **7.12**

Asset Name/ID cited in Table 1 [REP3-134]	Applicant Response
	Visualisations - Part 8 of 9 [APP-350] Viewpoint HE20). The Applicant believes its assessment is proportional and appropriate.
Church of St Mary (GII) 1122253	The Applicant notes the comment regarding the Church of Saint Mary (1122253).The Applicant has reviewed the assessment of this assets in light of the respondent's comments. The asset was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.8.274 and 3.8.276 which determined that the proximity of the Order Limits to the asset and the open environment surrounding it, even with some mature vegetation surrounding the church grounds, means that there would be visibility between them and the Order Limits. Because of this proximity and intervisibility the setting of the asset does extend to the Order Limits. The Listed Building was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** pages 309-310 and 1212-1213 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** pages 188 and 338. The current plan would remove the 132 kV PSC2-10 pylons and replace them with fewer taller 400 kV pylons. The Project would impact the asset's setting through the addition of pylons TB228-TB231 c. 200 m to the north-west, west and southwest. It is concluded, therefore, that the asset would experience Mid Less Than Substantial Harm. Response 6.21 of the **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** page 432, provides additional comment on the change of setting regarding views alongside a comment on page 166 of **8.4.1 Applicant's Comments on Relevant Representations [REP2-023]**. This conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment (see **7.12 Visualisations - Part 8 of 9 [APP-350]** Viewpoint HE20).

Asset Name/ID cited in Table 1 [REP3-134]	Applicant Response
	The Applicant believes its assessment is proportional and appropriate.
Sudbury's Farmhouse (GII) (1170946)	The Applicant notes the comment regarding Sudbury's Farmhouse (1170946). The Applicant has reviewed the assessment of this assets in light of the respondent's comments. The Applicant acknowledges that the Project would introduce Pylons and wires into the setting of the assets, with the closest pylon located c. 300m south-west, and the permanent Access Routes at c.110m from the Asset. The AVR is taken more than 130m from the Asset, along Sudburys Farm road. The asset will be mostly screened from the Project by vegetation and therefore the Applicant is satisfied that the conclusions reached in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**, of minor adverse significance of effect and in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** of lower less than substantial harm are proportionate and appropriate.
Wardropers Farmhouse (GII) (1293259)	The Applicant notes the comment regarding Wardropers Farmhouse (1293259).The Applicant has reviewed the assessment of this assets in light of the respondent's comments. The Applicant acknowledges that the Project would introduce pylons and wires into the setting of the assets, with the nearest pylon situated approximately 220 metres away. However, vegetation along Mountnessing Road will provide screening, meaning the Project would only be occasionally visible from the asset. Therefore, the Applicant is satisfied that the conclusions reached in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**, of minor adverse significance of effect and in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215**] of lower less than substantial harm are proportionate and appropriate.
'Rivenhall Place' (GII*) (1122598) and GII bridge and farm cottages	The Applicant notes the comment regarding Rivenhall Place (1122598) and Bridge to Rivenhall Place (1338253). This raised issue has been addressed in the paragraph HE 1.31 of **8.9.1 Applicant's Responses to First Written Questions [REP3-047]**, pages 317-318.

Asset Name/ID cited in Table 1 [REP3-134]	Applicant Response
'Rivenhall designed landscape'(5036) NDHA	The Applicant notes the comment regarding the NDHA Rivenhall designed landscape (5036).This raised issue has been addressed in the paragraph HE 1.31 of **8.9.1 Applicant's Responses to First Written Questions [REP3-047]**, pages 317-318.
Church of All Saints and St Mary (GI) 1169594 and scheduled monument (Roman Villa, Anglo-Saxon Hall, and cemetery, 1013831)+B45:E49	The Applicant notes the comment regarding the Church of All Saints and St. Mary (1169594) and the Scheduled Monument (1013831) adjacent. The Applicant has reviewed the assessment of this assets in light of the respondent's comments. Regarding the Church of All Saints and Saint Marys the matter has been addressed in HE 1.18 of **8.9.1 Applicant's Response to First Written Questions [AS-090]** page 305-306. Regarding the Scheduled Monument the setting is addressed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** 3.6.69. The setting of the monument makes a moderate contribution to its value but due to the erosion of the contemporary landscape, and a paucity of know contemporary site outside the bounds of (5019), the setting does not extend to the Order Limits. The conclusion on the setting of the Scheduled Monument has already been discussed in REP1-191 **8.8.1 Applicant's Comments on Written Representations [REP2-029]** page 79. The Applicant is satisfied that the conclusions reached in this assessment are proportional and appropriate.
'Chatham Hall' (GII)(1338512) and outbuildings (NDHA)	The Applicant notes the comment regarding Chatham Hall (1338512). Regarding the changes to setting the Applicant has already addressed the assessment of harm on Chatham Hall, see: ID 8.201 in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** page 414.
Felix Hall (GII) (1123797) and Felix Hall Park NDHA	The Applicant notes the comment regarding Felix Hall (1123797) and associated non-designated heritage asset. The Applicant has reviewed the assessment of this assets in light of the respondent's comments. The Listed Building and setting was established in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.6.254-255. The Applicant would like to highlight that Listed Building of Felix Hall (1123797) is located c.350m from the Order Limits with the nearest pylon situated c.490m away. The assessment put forward by the Responder to state Felix Hall's location as 50m away from the Order Limits may refer to an obsolete design route in this area. The **5.15 Design Development Report [APP-122]** and the **6.3 Environmental**

Asset Name/ID cited in Table 1 [REP3-134]	Applicant Response
	Statement Chapter 3 - Alternatives [APP-127] detail the changes to the Project following the 2024 statutory consultation and 2025 targeted consultations. The Project would be partially within the setting of the medium value asset. The asset was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** pages 230-231 and 1118-1119 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** pages 146 and 300. The Project is located at the limit of the asset's setting and due to some screening by mature vegetation and buildings, the Project would only be occasionally visible. The Project would result in a small change to the setting of the asset, but due to overall distance and the partial screening, there would be a low impact on the value of the asset. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm. The viewpoint HE12 commented on by the respondent (see **7.12 Visualisations - Part 8 of 9 [APP-350]**) omits the view shown in HE12(ii)f which identifies some of this aforementioned screening. The Applicant is satisfied that the conclusions reached in this assessment are proportional and appropriate. The associated estate grounds (5402) are of low value. In accordance with the methodology set out in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** - 11.4.25, the settings of all negligible and low value non-designated assets have not been assessed due to the lack of potential for any impacts to these assets to result in significant effects
Heywood Manor (GII) 1049736 and Moat NDHA, and Estate Grounds NDHA	The Applicant notes the comment regarding Heywood Manor (10497360) and associated estate grounds (1697). The Applicant has reviewed the assessment of this assets in light of the respondent's comments. The setting of Heywood Manor is addressed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] 3.2.999 - 1000**. The manor was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** pages 24 and 982-983 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** pages 21-22 and 212-213. Both construction and operational affects were assessed as resulting in a medium impact on its value and that the asset would experience Mid Less Than Substantial Harm. The Applicant considers this assessment to be appropriate and proportional following the methodology

Asset Name/ID cited in Table 1 [REP3-134]	Applicant Response
	set out in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, and **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**. The Applicant confirms that the associated estate grounds (1697) has been assessed both in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** and **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070].** The Applicant is satisfied that the conclusions reached in this assessment are proportional and appropriate. The Applicant fully recognises the importance of safeguarding archaeological remains of national significance, and our approach is aligned with this principle. The approach set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** and secured through Requirement 5 within **3.1 Draft Development Consent Order [APP-056]** already includes provision for a range of mitigation strategies, including preservation in situ, should highly significant remains be identified.
Kenningham Hall, Mulbarton (GII) 1373056, DMV, NDHA and outbuildings NDHAs	The Applicant notes the comment regarding Kenningham Hall (1373056) and non-designated heritage assets. The Applicant has reviewed the assessment of this assets in light of the respondent's comments. Regarding the changes to setting the Applicant has already addressed the assessment of harm on Kenningham Hall, see: **8.4.1 Applicant's Comments on Relevant Representations [REP2-023]** page 463 and in comment HE 1.19 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. The associated medium value non-designated assets (1010, 1067, 1227) had their setting addressed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.2.473, alongside Kenningham Hall. They were assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** 336-337, 359, 360, 657-658, 1195, 1214, and 1267. The Applicant still considers these assessments to be appropriate following the methodology set out in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, and **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**. The associated estate grounds (1593) are of low value. In accordance with the methodology set out in **6.11 Environmental Statement Chapter 11 -**

Asset Name/ID cited in Table 1 [REP3-134]	Applicant Response
	Historic Environment [AS-068] - 11.4.25, the settings of all negligible and low value non-designated assets have not been assessed due to the lack of potential for any impacts to these assets to result in significant effects Regarding groundworks impacting the DMV and grounds these were assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** . The Applicant is satisfied that the conclusions reached in this assessment are proportional and appropriate. The Applicant fully recognises the importance of safeguarding archaeological remains of national significance, and our approach is aligned with this principle. The approach set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** and secured through Requirement 5 within **3.1 Draft Development Consent Order [APP-056]** already includes provision for a range of mitigation strategies, including preservation in situ, should highly significant remains be identified.

Table 5.3 Applicant's Comments on Table 2 of Appendix F of the PEA Response [REP3-134]

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
Shotesham CA	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. Shotesham CA was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.2.24 - 26. "*The setting of the park is informed by the interrelationships between the designated and non-designated built assets within and views to and from the park's focal point, the hall at its centre. The dense belt of woodland largely encompassing the park allowing for only very occasional glimpses of the rural landscape beyond and emphasising its insular nature. The setting of the conservation area makes a considerable contribution to its value, but due to the mature woodland belt and development, copses and mature tree lined hedgerows in the intervening landscape, the setting does not extend to the Order Limits*." Although the asset is acknowledged to derive value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement**

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
	Appendix 11.1 - Historic Environment Baseline Report [APP-209] - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.
Tacolneston CA (CA19)	The matter concerning the assessment of Tacolneston CA has already been addressed. Please see comment HE 1.15 of **8.9.1 Applicant's Response to First Written Questions [AS-090]**, pages 292-293.
Winfarthing CA	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. Winfarthing CA was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.2.31 - 32 and it was identified that there are more open views to the east from the church graveyard and so pylon tops may be visible above the intermittent treeline. The setting of the conservation area, therefore, extends to the Order Limits. The Conservation Area was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** pages 32 and 1027 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 27 and 217. The Project would result in a slight change to the setting of the asset but due to overall distance and the partial screening, there would a negligible impact on the value of the asset and it would experience Lower Less Than Substantial Harm. The photomontage used by the respondent (see **7.12 Visualisations - Part 1 of 9 [APP-343]** Viewpoint 1.12) looks towards the pylon RG65 from c.560m southeast of the Conservation Area and omits views of the partial screening to the northeast (left) of the image. An additional heritage viewpoint located within the eastern edge of the Conservation Area is provided in **7.12 Visualisations - Part 9 of 9 [APP-351]** F231_HE23. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement**

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
	Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment (see **7.12 Visualisations - Part 9 of 9 [APP-351]** F231_HE23). The Applicant believes its assessment is proportional and appropriate.
Mellis CA	The matter concerning the assessment of Mellis CA has already been addressed. Please see comment REP1-191 of **8.8.1 Applicant's Comments on Written Representations [REP2-029]**, pages 71-72.
Badley Church Green CA	The matter concerning the assessment of Bradley Church Green CA has already been addressed. Please see comment REP1-191 of **8.8.1 Applicant's Comments on Written Representations [REP2-029]**, pages 75-76.
Ardleigh CA	The matter concerning the assessment of Ardleigh CA and its setting has already been addressed. Please see comment 15.6 bullet point 1, 15.12 and 15.13 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**, pages 380-381, 388-389.
St Marys Church (GII*)1112060	The Applicant has reviewed the assessment of the Church of St Mary in light of the respondent's comments and agrees that the Project would be occasionally visible from it. The impact of the Project on the settings of the church was assessed in accordance with the methodology set out in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**. The setting assessment for this asset was informed by Historic Environment viewpoint HE25, **7.12 Visualisations - Part 9 of 9 [APP-351]**, by Landscape and Visual Impact Assessment viewpoint 3.11 **(7.12 Visualisations - Part 3 of 9 [APP-345]**) and also by a walkover of the settlement taking in numerous views into and out of the settlement and also between internal elements of the historic environment. As noted in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**, no update is proposed for the HE25 viewpoint as it is located at a key view identified in the conservation area appraisal and is therefore considered appropriate. As the Project will be screened by mature vegetation and buildings the Applicant is satisfied that the conclusions reached in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment**

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
	Tables [AS-070], of minor adverse and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** of lower less than substantial harm are appropriate. The Applicant therefore proposes to make no changes to the assessment.
The Vicarage	The Applicant has reviewed the asset in light of the Respondent's comments. The Vicarage was scoped out of further assessment due to the assessment of its setting indicating it was informed by the settlement and did not extend beyond it, as outlined in the scoping report see **6.19 Scoping Report - including appendices B to K [APP-296]** 11.10.17 page 162 bullet point 3. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). The Applicant believes its assessment is proportional and appropriate.
Cottages to the north of Tudor Cottage	The Applicant has reviewed the asset in light of the Respondent's comments. Tudor Cottage and Cottage Adjoining to Right (North) was scoped out of further assessment due to the assessment of its setting indicating it was informated by the settlement and did not extend beyond it, as outlined in the scoping report see **6.19 Scoping Report - including appendices B to K [APP-296]** 11.10.17 page 162 bullet point 3. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). The Applicant believes its assessment is proportional and appropriate.
Ancient House	The Applicant has reviewed the asset in light of the Respondent's comments. Ancient House was scoped out of further assessment due to the assessment of its setting indicating it was informed by the settlement and did not extend beyond it, as outlined in the scoping report see **6.19 Scoping Report - including appendices B to K [APP-296]** 11.10.17 page 162 bullet point 3. This was conclusion has been informed by following best practice and

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
	guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). The Applicant believes its assessment is proportional and appropriate.
Boxley House	The Applicant has reviewed the asset in light of the Respondent's comments. Boxley House was scoped out of further assessment due to the assessment of its setting indicating it was informed by the settlement and did not extend beyond it, as outlined in the scoping report see **6.19 Scoping Report - including appendices B to K [APP-296]** 11.10.17 page 162 bullet point 3. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). The Applicant believes its assessment is proportional and appropriate.
Cypress Cottage	The Applicant has reviewed the asset in light of the Respondent's comments. Cypress Cottage was scoped out of further assessment due to the assessment of its setting indicating it was informated by the settlement and did not extend beyond it, as outlined in the scoping report see **6.19 Scoping Report - including appendices B to K [APP-296]** 11.10.17 page 162 bullet point 3. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). The Applicant believes its assessment is proportional and appropriate.
Dundas Place	The Applicant has reviewed the asset in light of the Respondent's comments. Dundas Place was scoped out of further assessment due to the assessment of its setting indicating it was informed by the settlement and did not extend beyond it, as outlined in the scoping

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
	report see **6.19 Scoping Report - including appendices B to K [APP-296]** 11.10.17 page 162 bullet point 3. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). The Applicant believes its assessment is proportional and appropriate.
New Hall	The Applicant has reviewed the asset in light of the Respondent's comments. New Hall was scoped out of further assessment due to the assessment of its setting indicating it was informed by the settlement and did not extend beyond it, as outlined in the scoping report see **6.19 Scoping Report - including appendices B to K [APP-296]** 11.10.17 page 162 bullet point 3. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). The Applicant believes its assessment is proportional and appropriate.
The Lion Inn	The Applicant has reviewed the asset in light of the Respondent's comments. The Lion Inn was scoped out of further assessment due to the assessment of its setting indicating it was informed by the settlement and did not extend beyond it, as outlined in the scoping report see **6.19 Scoping Report - including appendices B to K [APP-296]** 11.10.17 page 162 bullet point 3. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). The Applicant believes its assessment is proportional and appropriate.

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
Bounds Farmhouse (GII) 1147743	The Applicant notes the raised issue has already been addressed within **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** – p. 382 and **8.8.1 Applicant's Comments on Written Representations [REP2-029]** – ID REP1-438 p 317-318. The Applicant also gave full details about the mitigation considered for this asset within **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** – p. 350.
Fountain Farmhouse (GII) 1253912	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. 'Fountain Farmhouse' (1253912) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.4.755 – 56. "*The farmhouse is set back from the road by a garden and a green grassed area. The farm complex is to the west. The first edition OS maps shows that some of these buildings have since been demolished. To the east is the start of Ardleigh Reservoir to the south is Wick Lane and a later residential property. To the south-west is a quarry. To the west are agricultural fields. To the north is a green grassed area and a water way which leads to Ardleigh Reservoir. The quarry and reservoir are later additions to the landscape and have altered the wider historical setting of the asset. Overall, the assets setting makes a moderate contribution to its value. Due to the proximity of the asset to the Order Limits its setting extends into them.*" The Listed Building was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070**] pages 125-126 and 1052 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 87 and 256. Due to screening by mature vegetation, the Project would only be occasionally visible. The Project would result in a small change to the setting of the asset, but due to the partial screening, there would be a low impact (during construction) and negligible impact (during operation) on the value of the asset. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
	good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.
Wick Farmhouse (GII) 1253913 & Barn 1253914	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. 'Wick Farmhouse' (1253913) and 'Barn Adjacent to Road at Wick Farm' (1253914) were assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.4.757 – 58. "*The farmhouse is set back from the road, which is lined by a thick hedge, by a courtyard area and farm complex. The house is almost hidden from the road by large barns, included the listed barn. […] Surrounding the assets are agricultural fields. […] Aside from the quarry and later barns, the historical settings of the assets have little changed. Overall, the farmhouse setting makes a considerable contribution to its value and the barn setting makes a moderate contribution to its value. Due to their proximity to the Order Limits the assets' setting extends into the Order Limits*". Listed Buildings were assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** pages 126-127 and 1052-1053 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 87 and 257. Due to screening by mature vegetation and buildings, the Project would only be occasionally visible. The Project would result in a small change to the setting of the asset, but due to the partial screening, there would be a low impact on the value of the asset. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
	by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.
Fordstreet CA	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. Fordstreet CA was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.5.29 - 31 The assets setting plays a crucial role in enhancing its value, except the industrial part to its south-west. Due to the proximity with the Order Limits, between 25m and 50m, the setting of the conservation area, therefore, extends to the Order Limits. The Conservation Area was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** pages 196-197 and 1133-1134 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 124 and 285-286. The setting of the asset would be affected by the installation of pylons TB48 to TB52.The pylons may be visible from within the asset, particularly from the east and north-east c.250 m away. Woodland surrounding the exterior of the asset in the southern portion of the asset would break up views from the south of the conservation area towards the Project, while in the northern portion of the asset a mix of mature vegetation and buildings would break up views towards the Project. The assessments findings were medium impact and that the asset would experience Mid Less Than Substantial Harm. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the ‘five-step’ approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment (see **7.12 Visualisations - Part 9 of 9 [APP-351] F234_HE26**).

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
	The Applicant believes its assessment is proportional and appropriate.
Listed Buildings in the Conservation Area	
Barn To South East Of Friars Farmhouse' (GII) (1239835),	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. The Grade II listed 'Barn To South East Of Friars Farmhouse' (1239835) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.5.372 - 3.5.373 alongside several other buildings within the Fordstreet Conservation Area. "*Their setting is informed by their location in the settlement and especially by their roadside location. The road is the A1134, a busy road. Their setting is mostly residential but with fields further afield. Their setting is also informed by their relationship with each other and with the Conservation Area. The assets are mostly visible on the first edition OS map of 1881. Since the first edition, the settlement has grown a little during the 20th century, particularly south-west and north-west, but in general and even today, Fordstreet has retained its rural nature surrounded by fields. Therefore, their setting makes a considerable contribution to their value but does not extend to the Order Limits*." Although the asset is acknowledged to gain considerable value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.
Friars Farmhouse' (1267731),	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. 'Friars Farmhouse' (1267731) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.5.372 - 3.5.373 alongside several other buildings within the Fordstreet Conservation Area. *"Their setting is informed by their location in the settlement and especially by their roadside*

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
	location. The road is the A1134, a busy road. Their setting is mostly residential but with fields further afield. Their setting is also informed by their relationship with each other and with the Conservation Area. The assets are mostly visible on the first edition OS map of 1881. Since the first edition, the settlement has grown a little during the 20th century, particularly south-west and north-west, but in general and even today, Fordstreet has retained its rural nature surrounded by fields. Therefore, their setting makes a considerable contribution to their value but does not extend to the Order Limits." Although the asset is acknowledged to gain considerable value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.
Fordstreet Bridge (1273567)	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. 'Fordstreet Bridge' (1273567) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.5.372 - 3.5.373 alongside several other buildings within the Fordstreet Conservation Area. "*Their setting is informed by their location in the settlement and especially by their roadside location. The road is the A1134, a busy road. Their setting is mostly residential but with fields further afield. Their setting is also informed by their relationship with each other and with the Conservation Area. The assets are mostly visible on the first edition OS map of 1881. Since the first edition, the settlement has grown a little during the 20th century, particularly south-west and north-west, but in general and even today, Fordstreet has retained its rural nature surrounded by fields. Therefore, their setting makes a considerable contribution to their value but does not extend to the Order Limits."* Although the asset is acknowledged to gain considerable value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
	practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.
'Riverdale Cottage' (1110891)	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. 'Riverdale Cottage' (1110891) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.5.372 - 3.5.373 alongside several other buildings within the Fordstreet Conservation Area. "*Their setting is informed by their location in the settlement and especially by their roadside location. The road is the A1134, a busy road. Their setting is mostly residential but with fields further afield. Their setting is also informed by their relationship with each other and with the Conservation Area. The assets are mostly visible on the first edition OS map of 1881. Since the first edition, the settlement has grown a little during the 20th century, particularly south-west and north-west, but in general and even today, Fordstreet has retained its rural nature surrounded by fields. Therefore, their setting makes a considerable contribution to their value but does not extend to the Order Limits*." Although the asset is acknowledged to gain considerable value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
The ‘Queen's Head’ Public House’ (1110886)	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. The ‘Queen's Head’ Public House’ (1110886) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.5.372 - 3.5.373 alongside several other buildings within the Fordstreet Conservation Area. “*Their setting is informed by their location in the settlement and especially by their roadside location. The road is the A1134, a busy road. Their setting is mostly residential but with fields further afield. Their setting is also informed by their relationship with each other and with the Conservation Area. The assets are mostly visible on the first edition OS map of 1881. Since the first edition, the settlement has grown a little during the 20th century, particularly south-west and north-west, but in general and even today, Fordstreet has retained its rural nature surrounded by fields. Therefore, their setting makes a considerable contribution to their value but does not extend to the Order Limits*.” Although the asset is acknowledged to gain considerable value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the ‘five-step’ approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.
Aldham Carpentry (1110888)	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments.‘Aldham Carpentry’ (1110888) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.5.372 - 3.5.373 alongside several other buildings within the Fordstreet Conservation Area. “*Their setting is informed by their location in the settlement and especially by their roadside location. The road is the A1134, a busy road. Their setting is mostly residential but with fields further afield. Their setting is also informed by their relationship with each other and with the Conservation Area. The assets are mostly visible on the first edition OS map of 1881. Since the first edition, the settlement has grown a little during the 20th century, particularly south-west and north-west, but in general and even today, Fordstreet has*

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
	retained its rural nature surrounded by fields. Therefore, their setting makes a considerable contribution to their value but does not extend to the Order Limits." Although the asset is acknowledged to gain considerable value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.
The Bunches' (1110892)	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. 'The Bunches' (1110892) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.5.372 - 3.5.373 alongside several other buildings within the Fordstreet Conservation Area. "*Their setting is informed by their location in the settlement and especially by their roadside location. The road is the A1134, a busy road. Their setting is mostly residential but with fields further afield. Their setting is also informed by their relationship with each other and with the Conservation Area. The assets are mostly visible on the first edition OS map of 1881. Since the first edition, the settlement has grown a little during the 20th century, particularly south-west and north-west, but in general and even today, Fordstreet has retained its rural nature surrounded by fields. Therefore, their setting makes a considerable contribution to their value but does not extend to the Order Limits*." Although the asset is acknowledged to gain considerable value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
	by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.
Ferndale and Valley House' (1337410)	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. 'Ferndale and Valley House' (1337410) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.5.372 - 3.5.373 alongside several other buildings within the Fordstreet Conservation Area. "*Their setting is informed by their location in the settlement and especially by their roadside location. The road is the A1134, a busy road. Their setting is mostly residential but with fields further afield. Their setting is also informed by their relationship with each other and with the Conservation Area. The assets are mostly visible on the first edition OS map of 1881. Since the first edition, the settlement has grown a little during the 20th century, particularly south-west and north-west, but in general and even today, Fordstreet has retained its rural nature surrounded by fields. Therefore, their setting makes a considerable contribution to their value but does not extend to the Order Limits*." Although the asset is acknowledged to gain considerable value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.
Rose Cottage' (1110883)	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. 'Rose Cottage' (1110883) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.5.372 - 3.5.373 alongside several other buildings within the Fordstreet Conservation Area. "*Their setting is informed by their location in the settlement and especially by their roadside location. The road is the A1134, a busy road. Their setting is mostly residential but with fields further*

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
	afield. Their setting is also informed by their relationship with each other and with the Conservation Area. The assets are mostly visible on the first edition OS map of 1881. Since the first edition, the settlement has grown a little during the 20th century, particularly south-west and north-west, but in general and even today, Fordstreet has retained its rural nature surrounded by fields. Therefore, their setting makes a considerable contribution to their value but does not extend to the Order Limits." Although the asset is acknowledged to gain considerable value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.
Fore Acres' (1110889)	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. 'Fore Acres' (1110889) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.5.372 - 3.5.373 alongside several other buildings within the Fordstreet Conservation Area. "*Their setting is informed by their location in the settlement and especially by their roadside location. The road is the A1134, a busy road. Their setting is mostly residential but with fields further afield. Their setting is also informed by their relationship with each other and with the Conservation Area. The assets are mostly visible on the first edition OS map of 1881. Since the first edition, the settlement has grown a little during the 20th century, particularly south-west and north-west, but in general and even today, Fordstreet has retained its rural nature surrounded by fields. Therefore, their setting makes a considerable contribution to their value but does not extend to the Order Limits.*" Although the asset is acknowledged to gain considerable value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental**

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
	Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.
Cooks Mill House (1225093)	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. The Grade II listed 'Cooks Mill House' (1225093) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.5.374 - 3.5.375. "*The setting is informed by its location within a farm complex, encompassed by agricultural fields and woodlands to the south and west. While the setting enhances the property's appeal, the presence of mature trees limits visibility of the Project from the house, although it may become more visible during the autumn and winter season. Overall, the setting does not appear to have been altered and therefore makes a considerable contribution to the value of this asset, and it does not extend to the Order Limits.*" Although the asset is acknowledged to gain considerable value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.
Archaeology	
Roman hunting lodge at Fordham (4081) and Roman site at Fossets Lane	Pylon TB47 was moved north-east to avoid direct physical impact to the archaeological site in this area. The new location for pylon TB47 has been geophysically surveyed, with no

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
	results of note, and will be evaluated by archaeological trial trenching to determine if mitigation is required. The setting of the asset has been acknowledged in the assessment **[APP-209] – 3.5.88** including the views towards Colchester and based on the asset value the impacts are deemed to be accurate following the impact assessment methodology. Landscape and visual effects on the same stretch are illustrated by general LVIA Viewpoints 4.20, 4.24, 4.25 and 4.27 (**7.12 Visualisations - Part 5 of 9 [APP-347]**) and by Heritage Viewpoint HE 26 (photomontage) (**7.12 Visualisations - Part 9 of 9 [APP-351]**), which together confirm that the amended alignment minimises intrusion into key views. The Applicant fully recognises the importance of safeguarding archaeological remains of national significance, and our approach is aligned with this principle. The approach set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** and secured through Requirement 5 within **3.1 Draft Development Consent Order [APP-056]** already includes provision for a range of mitigation strategies, including preservation in situ, should highly significant remains be identified.
White Notley Conservation Area	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. White Notley CA was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.6.22 - 23. "*The setting of the conservation area is informed by the relationships between the listed buildings and the non-designated buildings that contribute to the character of the asset. [...] The setting of the asset is further informed by the surrounding agricultural landscape with which it has a historical relationship. The link to the wider landscape has, however, been eroded by 20th century residential development, although this is maintained by the views of the Brain Valley and the landscape beyond. The setting of the conservation area makes a considerable contribution to its value but due to its largely internal focus and modern residential development on the southern edge of the settlement, the setting does not extend to the Order Limits*." The photomontage used by the respondent (see **7.12 Visualisations - Part 5 of 9 [APP-343]** Viewpoint 5.04) is located c.85m southeast outside of the Conservation Area in an area separated by the aforementioned 20th century development (see **7.12 Visualisations - Part 5 of 9 [APP-343]** Viewpoint 5.04 - 7.12.F139_VP5.04f). An additional heritage viewpoint located adjacent to the western edge of the Conservation Area is provided in **7.12 Visualisations - Part 8 of 9 [APP-350]** F221_HE14.

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
	Although the asset is acknowledged to derive considerable value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment (see **7.12 Visualisations - Part 8 of 9 [APP-350]** F221_HE14). The Applicant believes its assessment is proportional and appropriate.
Kelvedon CA	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. Kelvedon CA was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.6.28 - 29. "*The setting of the conservation area is informed by its focus on the fossilised medieval street plan and by the relationships between the listed buildings and by their relationships with the non-designated building stock that contributes to the character of the conservation area. The asset is largely enclosed by 20th and 21st century development and some later development within detracts from the character of the conservation area. The setting of the asset, therefore, makes a moderate contribution to its value, but due to its enclosed nature, the setting does not extend to the Order Limits*." Although the asset is acknowledged to derive moderate value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment.

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
	The Applicant believes its assessment is proportional and appropriate.
Great Tey CA	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. Great Tey CA was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.5.33 - 34. "*The conservation area is situated within an urban setting, characterised by extensive views from both the north-east and south-east directions. Within its immediate surroundings, several smaller green spaces enhance its overall value. While the setting undeniably contributes significantly to its worth, it remains contained within the conservation area's boundaries, not extending to the Order Limits due to its somewhat insular nature*." Although the asset is acknowledged to derive considerable value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment (see **7.12 Visualisations - Part 4 of 9 [APP-346]** Viewpoint 4.10). The Applicant believes its assessment is proportional and appropriate.
Great Waltham CA	The matter concerning the assessment of Great Waltham CA has already been addressed. Please see comment REP1-191 of **8.8.1 Applicant's Comments on Written Representations [REP2-029]**, pages 82-83.
Little Waltham CA	The matter concerning the assessment of Little Waltham CA has already been addressed. Please see comment REP1-191 of **8.8.1 Applicant's Comments on Written Representations [REP2-029]**, pages 81-82.

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
Listed Buildings in the Conservation Area	
42 The Street (1152026),	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. 42 The Street (1152026) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** 3.7.368 - 69. "*The setting of the listed buildings within the Little Waltham Conservation Area is informed by their interrelationships with the assets identified by Historic England as being part of their asset group. [...] The setting of the assets, particularly of those on the western and northern sides of The Street, is further informed by the Chelmer river valley and its flanking pastoral land with which the settlement is intrinsically linked, although the B1008 has detrimentally affected this relationship. The setting of the assets, therefore, makes a considerable contribution the value of the assets*." The asset was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** pages 271 and 1145-1146 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 167 and 318. The Project would be partially located within the setting of the medium value asset. However, due to screening by mature vegetation, buildings, and infrastructure, the Project would only be occasionally visible. As the Project would result in a slight change to the setting of the asset due to the partial screening, there would be a negligible impact on the value of the asset. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm. The Applicant's conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment (see **7.12 Visualisations - Part 9 of 9 [APP-351]** Viewpoint HE31).

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
	The Applicant believes its assessment is proportional and appropriate.
36 - 40 The Street (1122025),	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. 36 - 40 The Street (1122025) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** 3.7.368 - 69. "*The setting of the listed buildings within the Little Waltham Conservation Area is informed by their interrelationships with the assets identified by Historic England as being part of their asset group. [...] The setting of the assets, particularly of those on the western and northern sides of The Street, is further informed by the Chelmer river valley and its flanking pastoral land with which the settlement is intrinsically linked, although the B1008 has detrimentally affected this relationship. The setting of the assets, therefore, makes a considerable contribution the value of the assets*." The asset was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** pages 272 and 1146 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 167 and 319. The Project would be partially located within the setting of the medium value asset. However, due to screening by mature vegetation, buildings, and infrastructure, the Project would only be occasionally visible. As the Project would result in a slight change to the setting of the asset due to the partial screening, there would be a negligible impact on the value of the asset. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm. The Applicant's conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment (see **7.12 Visualisations - Part 9 of 9 [APP-351]** Viewpoint HE31).

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
	The Applicant believes its assessment is proportional and appropriate.
The Bell Public House (1122024)	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. The The Bell Public House (1122024) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** 3.7.368 - 69. "*The setting of the listed buildings within the Little Waltham Conservation Area is informed by their interrelationships with the assets identified by Historic England as being part of their asset group. [...] The setting of the assets, particularly of those on the western and northern flanks of The Street, is further informed by the Chelmer river valley and its flanking pastoral land with which the settlement is intrinsically linked, although the B1008 has detrimentally affected this relationship. The setting of the assets, therefore, makes a considerable contribution the value of the assets*." The asset was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** pages 272-273 and 1146-1147 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 167 and 319. The Project would be partially located within the setting of the medium value asset. However, due to screening by mature vegetation, buildings, and infrastructure, the Project would only be occasionally visible. As the Project would result in a slight change to the setting of the asset due to the partial screening, there would be a negligible impact on the value of the asset. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm. The Applicant's conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment (see **7.12 Visualisations - Part 9 of 9 [APP-351]** Viewpoint HE31).

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
	The Applicant believes its assessment is proportional and appropriate.
30 The Street (1122023),	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments.30 The Street (1122023) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** 3.7.368 - 69. "*The setting of the listed buildings within the Little Waltham Conservation Area is informed by their interrelationships with the assets identified by Historic England as being part of their asset group. [...] The setting of the assets, particularly of those on the western and northern flanks of The Street, is further informed by the Chelmer river valley and its flanking pastoral land with which the settlement is intrinsically linked, although the B1008 has detrimentally affected this relationship. The setting of the assets, therefore, makes a considerable contribution the value of the assets*." The asset was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** page 273 and 1147 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 168 and 319. The Project would be partially located within the setting of the medium value asset. However, due to screening by mature vegetation, buildings, and infrastructure, the Project would only be occasionally visible. As the Project would result in a slight change to the setting of the asset due to the partial screening, there would be a negligible impact on the value of the asset. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm. The Applicant's conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment (see **7.12 Visualisations - Part 9 of 9 [APP-351]** Viewpoint HE31).

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
	The Applicant believes its assessment is proportional and appropriate.
The Limes (1122022),	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. The Limes (1122022) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** 3.7.368 - 69. "*The setting of the listed buildings within the Little Waltham Conservation Area is informed by their interrelationships with the assets identified by Historic England as being part of their asset group. [...] The setting of the assets, particularly of those on the western and northern sides of The Street, is further informed by the Chelmer river valley and its flanking pastoral land with which the settlement is intrinsically linked, although the B1008 has detrimentally affected this relationship. The setting of the assets, therefore, makes a considerable contribution the value of the assets*." The asset was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** pages 274 and 1147-1148 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 168 and 319. The Project would be partially located within the setting of the medium value asset. However, due to screening by mature vegetation, buildings, and infrastructure, the Project would only be occasionally visible. As the Project would result in a slight change to the setting of the asset due to the partial screening, there would be a negligible impact on the value of the asset. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm. The Applicant's conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment (see **7.12 Visualisations - Part 9 of 9 [APP-351]** Viewpoint HE31). The Applicant believes its assessment is proportional and appropriate.

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
Oxford House (1122055),	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. 'Oxford House' (1122055) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** 3.7.368 - 69. "*The setting of the listed buildings within the Little Waltham Conservation Area is informed by their interrelationships with the assets identified by Historic England as being part of their asset group. [...] The setting of the assets, particularly of those on the western and northern sides of The Street, is further informed by the Chelmer river valley and its flanking pastoral land with which the settlement is intrinsically linked, although the B1008 has detrimentally affected this relationship. The setting of the assets, therefore, makes a considerable contribution the value of the assets.* "The asset was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** pages 274-275 and 1148 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 168 and 320. The Project would be partially located within the setting of the medium value asset. However, due to screening by mature vegetation, buildings, and infrastructure, the Project would only be occasionally visible. As the Project would result in a slight change to the setting of the asset due to the partial screening, there would be a negligible impact on the value of the asset. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm. The Applicant's conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment (see 7**.12 Visualisations - Part 9 of 9 [APP-351]** Viewpoint HE31). The Applicant believes its assessment is proportional and appropriate.
37 The Street' (1122054),	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments.37 The Street (1122054) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] 3.7.368 - 69**. "*The*

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
	setting of the listed buildings within the Little Waltham Conservation Area is informed by their interrelationships with the assets identified by Historic England as being part of their asset group. [...] The setting of the assets, particularly of those on the western and northern sides of The Street, is further informed by the Chelmer river valley and its flanking pastoral land with which the settlement is intrinsically linked, although the B1008 has detrimentally affected this relationship. The setting of the assets, therefore, makes a considerable contribution the value of the assets." The asset was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** pages 275-276 and 1148 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 169 and 320. The Project would be partially located within the setting of the medium value asset. However, due to screening by mature vegetation, buildings, and infrastructure, the Project would only be occasionally visible. As the Project would result in a slight change to the setting of the asset due to the partial screening, there would be a negligible impact on the value of the asset. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm. The Applicant's conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment (see **7.12 Visualisations - Part 9 of 9 [APP-351]** Viewpoint HE31). The Applicant believes its assessment is proportional and appropriate.
Millstone Cottage (1151939)	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. Millstone Cottage (1151939) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** 3.7.162-164 and 3.7.368 - 69. "*The setting of the listed buildings within the Little Waltham Conservation Area is informed by their interrelationships with the assets identified by*

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
	Historic England as being part of their asset group. [...] The setting of the assets, particularly of those on the western and northern sides of The Street, is further informed by the Chelmer river valley and its flanking pastoral land with which the settlement is intrinsically linked, although the B1008 has detrimentally affected this relationship. The setting of the assets, therefore, makes a considerable contribution the value of the assets." The asset was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** pages 247-248 and 1129 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** pages 155 and 307-308. The Project is located at the limit of the asset's setting and due to some screening by mature vegetation, buildings, and infrastructure, the Project would only be occasionally visible. The Project would result in a small change to the setting of the asset, but due to overall distance and the partial screening, there would be a low impact on the value of the asset. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm. The Applicant's conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment (see **7.12 Visualisations - Part 9 of 9 [APP-351]** Viewpoint HE31). The Applicant believes its assessment is proportional and appropriate.
Two Gates (1151949)	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. Two Gates (1151949) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.7.368 - 369. "*The setting of the listed buildings within the Little Waltham Conservation Area is informed by their interrelationships with the assets identified by Historic England as being part of their asset group. [...] The setting of the assets, particularly of those on the western and northern*

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
	sides of The Street, is further informed by the Chelmer river valley and its flanking pastoral land with which the settlement is intrinsically linked, although the B1008 has detrimentally affected this relationship. The setting of the assets, therefore, makes a considerable contribution the value of the assets." The asset was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** page 275 and 1148 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 169 and 320. The Project would be partially located within the setting of the medium value asset. However, due to screening by mature vegetation, buildings, and infrastructure, the Project would only be occasionally visible. As the Project would result in a slight change to the setting of the asset due to the partial screening, there would be a negligible impact on the value of the asset. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm. The Applicant's conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment (see **7.12 Visualisations - Part 9 of 9 [APP-351]** Viewpoint HE31). The Applicant believes its assessment is proportional and appropriate.
Marshalls Cottages (GII*) (1337058)	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. It should be noted for clarity that Marshall's Cottages' (1337058) is located in the parish of West Tilbury, rather than the Little Waltham Conservation Area stated in Appendix F. The asset was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.9.145 - 3.9.146. The high evergreen hedges and trees that surround and provide a boundary to the property of the asset, and as such the setting of the asset is set within the bounds of the property. The farm complex on the east side of Blue Anchor Lane provides considerable screening

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
	between the asset and the Project, but due to the proximity of the Order Limits, it is likely the construction phase of the Project would introduce noise and perhaps glimpses of plant movement into the setting. The asset was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** pages 329 and 1189-1190 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 169 and 348. During both the construction and operation phase, the Project would be partially within the setting of the high value asset. However, due to screening by vegetation and buildings, the Project would only be occasionally visible. The Project would result in a small change to the setting of the asset, but due to the partial screening, there would be a low impact on the value of the asset. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm. The Applicant's conclusion has been informed by following best practice and guidance as per the assessment methodology in 6.11.A1 Environmental Statement **Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - **Annex C, 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.
Margaretting CA	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. Margaetting CA was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.8.18 - 19. The conservation area is focused on the green space of the Peacock Estate parkland and Parsonage Farm combined, and includes the non-designated Peacocks Homestead model Farm, and Evelands Hall north of Main Road and a portion of the thoroughfare itself. "*The setting of the parkland is almost entirely insular as views in and out are extremely rare and broken by vegetation if glimpsed at all. [...] The setting of the conservation area, therefore, is somewhat disjoined and so makes a moderate contribution to its value, but due to its*

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
	largely insular nature, and the intervening A12 dual carriageway, located between the conservation area and the Order Limits, the setting does not extend to the Order Limits." Although the asset is acknowledged to derive moderate value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.
Hutton Village CA	The matter concerning the assessment of Hutton CA has already been addressed. Please see comment 6.49-50 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**, pages 433-434.
Little Burstead CA	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. Little Burstead CA was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.8.43 – 47. "*Although there are few views out of the village, mainly due to trees and topography, the conservation area does overlook an area to the south-west towards and into the Order Limits. Without the agricultural environment and peaceful nature the historical and aesthetic value would be reduced. Overall, the setting makes a considerable contribution to the value of the conservation area*. "The Conservation Area was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** pages 312 and 1214 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 190 and 339. The Project would be partially within the setting of the medium value asset. However, due to screening by mature vegetation and buildings, but also distance, the Project would only be occasionally visible. The Project would result in a small change to the setting of the asset, but due to the partial screening, there would be a negligible impact on the value of the asset and that the asset would experience Lower Less Than Substantial Harm.

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
	This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment The Applicant believes its assessment is proportional and appropriate.
West Tilbury CA	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. West Tilbury CA was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.9.27 – 3.9.30. The setting of the conservation area makes a considerable contribution to its value and due to the proximity of the Project, the setting extends to the Order Limits. The Conservation Area was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** pages 332-333 and 1192 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** pages 201 and 349. During the operation phase, the Project would be partially within the setting of the high value asset. However, due to screening by vegetation, the Project would only be occasionally visible. The Project would result in a small change to the setting of the asset, but due to the partial screening, there would be a low impact on the value of the asset. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm. The assessment put forward by the Responder makes reference to an out-of-date design route. The route no longer passes through the conservation area, and is further from the asset. The **5.15 Design Development Report [APP-122]** and the **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]** page 76 detail the changes to the Project following the 2024 statutory consultation and 2025 targeted consultations. The changes included connecting electrically to Tilbury Substation via a new substation (Tilbury North)

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
	connected to the existing Tilbury Substation via a modification to the 400 kV YYJ line, rather than into the Freeport area. The alternative connection arrangement was developed following consultation feedback and technical review identifying challenges with the Freeport interaction and development constraints. In all cases, factors relevant to the change have been considered (which can be multiple and potentially conflicting) and a balanced decision made taking into account environmental (including the historic environment) and socio-economic effects, engineering feasibility and risks, cost and programme amongst other factors. The Applicant's conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment The Applicant believes its assessment is proportional and appropriate.
Listed Buildings in the Conservation Area	
'The Bakery' (1111634)	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. The Grade II listed 'The Bakery' (1111634) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.9.265 - 3.9.266. "*The setting of the asset is informed by the characterful and historic village centre but also to the surrounding agricultural landscape which was a key element to the historic activity of the settlement. The name of the bakery illudes to its function within the community of the village and the service it provided to the settlement. The setting of the asset is focused on its village green setting and so it does not extend to the Order Limits*". Although the asset is acknowledged to gain considerable value from its setting, it does not

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
	extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment.
'Holford Farm (8089) NDHA	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. The undated cropmark complex (8089) on farmland north of Rectory Road was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.9.330 - 3.9.331. "*The setting of the asset is informed by the surrounding agricultural landscape, which likely shares characteristic of the asset's contemporary environment. This landscape has, however, been significantly impacted by modern development, infrastructure, and mineral extraction, and so the setting makes minor contribution to its value of the asset. The setting of the asset does not extend to the Order Limits*". The asset is acknowledged to derive minor value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.
'Manor Farm' (8086) NDHA	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. The undated cropmark complex (8086) on land at Manor Farm was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.9.332 - 3.9.333. "*The setting of the asset is informed by the surrounding agricultural landscape, which likely shares characteristic of the asset's*

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
	contemporary environment. This landscape has, however, been significantly impacted by modern development, infrastructure, and mineral extraction, and so the setting makes minor contribution to its value of the asset. The setting of the asset does not extend to the Order Limits." The asset is acknowledged to derive minor value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.
'Wick House' (8100) NDHA	The Applicant has not assessed the non-designated asset Wick House due to its distance outside the Order Limits and the Study Area agreed with consultees within the scoping report, see **6.19 Scoping Report - including appendices B to K [APP-296]**. The assessment put forward by the Responder to include Milton Place refers to an out-of-date design route in this area. The **5.15 Design Development Report [APP-122]** and the **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]** page 76 detail the changes to the Project following the 2024 statutory consultation and 2025 targeted consultations. The changes included connecting electrically to Tilbury Substation via a new substation (Tilbury North) connected to the existing Tilbury Substation via a modification to the 400 kV YYJ line, rather than into the Freeport area. The alternative connection arrangement was developed following consultation feedback and technical review identifying challenges with the Freeport interaction and development constraints. In all cases, factors relevant to the change have been considered (which can be multiple and potentially conflicting) and a balanced decision made taking into account environmental (including the historic environment) and socio-economic effects, engineering feasibility and risks, cost and programme amongst other factors.

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
	All non-designated heritage assets (NDHA) within the Study Area were assessed to determine their value in accordance with **6.19 Scoping Report [APP-288 – APP-296], 6.20 Scoping Opinion [APP-297]** and the methodology set out in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** - 11.4.2 page 26-27. The settings of all negligible and low value non-designated assets have not been assessed due to the lack of potential for any impacts to these assets to result in significant effects.
East Tilbury	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. East Tilbury CA was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.9.31 - 3.9.33. "*The setting of the conservation area is informed the relationships between the factory buildings and housing, by the uniformity of the architecture for the two elements and by the planned nature of the settlement. The setting is further informed by views of the surrounding rural landscape, although this has been eroded to the east by later 20th century residential development. [...] The setting of the conservation area makes a considerable contribution to its value, but due to its insular nature, the setting does not extend to the Order Limits*." Although the asset is acknowledged to derive considerable value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
Milton Place CA	The Applicant has not assessed Milton Place CA as part of the scheme, as it is located within Gravesend, beyond both the 2km and 3km Study Area for designated heritage assets agreed with consultees within the scoping report, see **6.19 Scoping Report - including appendices B to K [APP-296]** 11.3.1-3 page 150. The assessment put forward by the Responder to include Milton Place refers to an out-of-date design route in this area. The **5.15 Design Development Report [APP-122]** and the **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]** page 76 detail the changes to the Project following the 2024 statutory consultation and 2025 targeted consultations. The changes included connecting electrically to Tilbury Substation via a new substation (Tilbury North) connected to the existing Tilbury Substation via a modification to the 400 kV YYJ line, rather than into the Freeport area. The alternative connection arrangement was developed following consultation feedback and technical review identifying challenges with the Freeport interaction and development constraints. In all cases, factors relevant to the change have been considered (which can be multiple and potentially conflicting) and a balanced decision made taking into account environmental (including the historic environment) and socio-economic effects, engineering feasibility and risks, cost and programme amongst other factors.
'Circular Brick Kilns at W H Collier Brick and Tile Works' 1020999 Scheduled Monument	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. The Circular Brick Kilns at W H Collier Brick and Tile Works (1020999) were assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209**] - 3.5.414 - 3.5.416. "*The setting of this schedule monument is primarily informed by its rural context and location on a private road, contributing to a serene environment. Further south is the A12 and other industrial activities, but the woodland surrounding the schedule monument acts as a buffer and preserves the asset. Therefore, the setting of the 'Circular Brick Kilns at W H Collier Brick and Tile Works' schedule monument makes a considerable contribution to its value and does not extend to the Order Limits*." Although the asset is acknowledged to derive considerable value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
	C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.
Cressing Temple Scheduled monument and 2 barns (GI)	The Applicant has reviewed the assessment of the assets in light of the Respondent's comments. The Cressing Temple Scheduled Monument (1002122) and two Grade I Listed Barns (1123865, 1123866) were assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.6.104-3.6.107. The setting of the scheduled monument and listed buildings, is shared and informed by their interrelationships and by the surrounding agricultural landscape. It makes a considerable contribution to their values, and extends to the Order Limits. The assets were assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** pages 200, 211-213, 1098 and 1106-1107, and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** pages 125, 132-133, 286-287 and 291-292. During the operation phase, the Project would be partially within the setting of the high value asset. However, due to screening by mature vegetation and buildings, the Project would only be occasionally visible. The Project would result in a small change to the setting of the asset, but due to the partial screening, there would be a negligible impact on the value of the asset. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm. The Applicant notes that the viewshed utilised by the Respondent (see **7.12 Visualisations - Part 6 of 9 [APP-348]** Viewpoint 5.11) to inform their comment omits to include the full image, and thus additional screening located to the northeast and southwest of the images. The Applicants assessment has taken this screening into account in its assessment. The Applicant also notes the second viewshed utilised is located at the PRoW in Faulkbourne, c.1.35km south of Cressing Temple (see **7.12 Visualisations - Part 6 of 9 [APP-348]** Viewpoint 5.12). The Applicant's conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, **6.11 Environmental**

Asset Name/ID cited in Table 2 [REP3-134]	NG Response
	Statement Chapter 11 - Historic Environment [AS-068] and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment (see **7.12 Visualisations - Part 6 of 9 [APP-348]** Viewpoint 5.11). The Applicant believes its assessment is proportional and appropriate.

Table 5.4 Applicant's Comments on Table 3 of Appendix F of the PEA Response [REP3-134]

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
Shotesham CA	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. Shotesham CA was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.2.24 - 26. "*The setting of the park is informed by the interrelationships between the designated and non-designated built assets within and views to and from the park's focal point, the hall at its centre. The dense belt of woodland largely encompassing the park allowing for only very occasional glimpses of the rural landscape beyond and emphasising its insular nature. The setting of the conservation area makes a considerable contribution to its value, but due to the mature woodland belt and development, copses and mature tree lined hedgerows in the intervening landscape, the setting does not extend to the Order Limits*." Although the asset is acknowledged to derive value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
	by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.
Tacolneston CA (CA19)	The matter concerning the assessment of Tacolneston CA has already been addressed. Please see comment HE 1.15 of **8.9.1 Applicant's Response to First Written Questions [AS-090]**, pages 292-293.
Winfarthing CA	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. Winfarthing CA was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.2.31 - 32 and it was identified that there are more open views to the east from the church graveyard and so pylon tops may be visible above the intermittent treeline. The setting of the conservation area, therefore, extends to the Order Limits. The Conservation Area was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** pages 32 and 1027 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 27 and 217. The Project would result in a slight change to the setting of the asset but due to overall distance and the partial screening, there would a negligible impact on the value of the asset and it would experience Lower Less Than Substantial Harm. The photomontage used by the respondent (see **7.12 Visualisations - Part 1 of 9 [APP-343]** Viewpoint 1.12) looks towards the pylon RG65 from c.560m southeast of the Conservation Area and omits views of the partial screening to the northeast (left) of the image. An additional heritage viewpoint located within the eastern edge of the Conservation Area is provided in **7.12 Visualisations - Part 9 of 9 [APP-351]** F231_HE23. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the ‘five-step’ approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
	by site visits, aerial and street-view imagery, and viewpoint assessment (see **7.12 Visualisations - Part 9 of 9 [APP-351]** F231_HE23). The Applicant believes its assessment is proportional and appropriate.
Mellis CA	The matter concerning the assessment of Mellis CA has already been addressed. Please see comment REP1-191 of **8.8.1 Applicant's Comments on Written Representations [REP2-029]**, pages 71-72.
Badley Church Green CA	The matter concerning the assessment of Bradley Church Green CA has already been addressed. Please see comment REP1-191 of **8.8.1 Applicant's Comments on Written Representations [REP2-029]**, pages 75-76.
Ardleigh CA	The matter concerning the assessment of Ardleigh CA and its setting has already been addressed. Please see comment 15.6 bullet point 1, 15.12 and 15.13 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**, pages 380-381, 388-389.
St Marys Church (GII*)1112060	The Applicant has reviewed the assessment of the Church of St Mary in light of the respondent's comments and agrees that the Project would be occasionally visible from it. The impact of the Project on the settings of the church was assessed in accordance with the methodology set out in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**. The setting assessment for this asset was informed by Historic Environment viewpoint HE25, **7.12 Visualisations - Part 9 of 9 [APP-351]**, by Landscape and Visual Impact Assessment viewpoint 3.11 **(7.12 Visualisations - Part 3 of 9 [APP-345]**) and also by a walkover of the settlement taking in numerous views into and out of the settlement and also between internal elements of the historic environment. As noted in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**, no update is proposed for the HE25 viewpoint as it is located at a key view identified in the conservation area appraisal and is therefore considered appropriate. As the Project will be screened by mature vegetation and buildings the Applicant is satisfied that the conclusions reached in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**, of minor adverse and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** of lower less

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
	than substantial harm are appropriate. The Applicant therefore proposes to make no changes to the assessment.
The Vicarage	The Applicant has reviewed the asset in light of the Respondent's comments. The Vicarage was scoped out of further assessment due to the assessment of its setting indicating it was informed by the settlement and did not extend beyond it, as outlined in the scoping report see **6.19 Scoping Report - including appendices B to K [APP-296]** 11.10.17 page 162 bullet point 3. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). The Applicant believes its assessment is proportional and appropriate.
Cottages to the north of Tudor Cottage	The Applicant has reviewed the asset in light of the Respondent's comments. Tudor Cottage and Cottage Adjoining to Right (North) was scoped out of further assessment due to the assessment of its setting indicating it was informated by the settlement and did not extend beyond it, as outlined in the scoping report see **6.19 Scoping Report - including appendices B to K [APP-296]** 11.10.17 page 162 bullet point 3. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). The Applicant believes its assessment is proportional and appropriate.
Ancient House	The Applicant has reviewed the asset in light of the Respondent's comments. Ancient House was scoped out of further assessment due to the assessment of its setting indicating it was informed by the settlement and did not extend beyond it, as outlined in the scoping report see **6.19 Scoping Report - including appendices B to K [APP-296]** 11.10.17 page 162 bullet point 3. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
	includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). The Applicant believes its assessment is proportional and appropriate.
Boxley House	The Applicant has reviewed the asset in light of the Respondent's comments. Boxley House was scoped out of further assessment due to the assessment of its setting indicating it was informed by the settlement and did not extend beyond it, as outlined in the scoping report see **6.19 Scoping Report - including appendices B to K [APP-296]** 11.10.17 page 162 bullet point 3. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). The Applicant believes its assessment is proportional and appropriate.
Cypress Cottage	The Applicant has reviewed the asset in light of the Respondent's comments. Cypress Cottage was scoped out of further assessment due to the assessment of its setting indicating it was informated by the settlement and did not extend beyond it, as outlined in the scoping report see **6.19 Scoping Report - including appendices B to K [APP-296]** 11.10.17 page 162 bullet point 3. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). The Applicant believes its assessment is proportional and appropriate.
Dundas Place	The Applicant has reviewed the asset in light of the Respondent's comments. Dundas Place was scoped out of further assessment due to the assessment of its setting indicating it was informed by the settlement and did not extend beyond it, as outlined in the scoping report see **6.19 Scoping Report - including appendices B to K [APP-296]** 11.10.17 page 162 bullet point 3. This was conclusion has been informed by following best practice and

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
	guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). The Applicant believes its assessment is proportional and appropriate.
New Hall	The Applicant has reviewed the asset in light of the Respondent's comments. New Hall was scoped out of further assessment due to the assessment of its setting indicating it was informed by the settlement and did not extend beyond it, as outlined in the scoping report see **6.19 Scoping Report - including appendices B to K [APP-296]** 11.10.17 page 162 bullet point 3. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). The Applicant believes its assessment is proportional and appropriate.
The Lion Inn	The Applicant has reviewed the asset in light of the Respondent's comments. The Lion Inn was scoped out of further assessment due to the assessment of its setting indicating it was informed by the settlement and did not extend beyond it, as outlined in the scoping report see **6.19 Scoping Report - including appendices B to K [APP-296]** 11.10.17 page 162 bullet point 3. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). The Applicant believes its assessment is proportional and appropriate.
Bounds Farmhouse (GII) 1147743	The Applicant notes the raised issue has already been addressed within **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** – p. 382 and **8.8.1 Applicant's Comments on Written Representations [REP2-029]** – ID REP1-438 p 317-318. The

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
	Applicant also gave full details about the mitigation considered for this asset within **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** – p. 350.
Fountain Farmhouse (GII) 1253912	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. 'Fountain Farmhouse' (1253912) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.4.755 – 56. "*The farmhouse is set back from the road by a garden and a green grassed area. The farm complex is to the west. The first edition OS maps shows that some of these buildings have since been demolished. To the east is the start of Ardleigh Reservoir to the south is Wick Lane and a later residential property. To the south-west is a quarry. To the west are agricultural fields. To the north is a green grassed area and a water way which leads to Ardleigh Reservoir. The quarry and reservoir are later additions to the landscape and have altered the wider historical setting of the asset. Overall, the assets setting makes a moderate contribution to its value. Due to the proximity of the asset to the Order Limits its setting extends into them.*" The Listed Building was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070**] pages 125-126 and 1052 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 87 and 256. Due to screening by mature vegetation, the Project would only be occasionally visible. The Project would result in a small change to the setting of the asset, but due to the partial screening, there would be a low impact (during construction) and negligible impact (during operation) on the value of the asset. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment.

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
	The Applicant believes its assessment is proportional and appropriate.
Wick Farmhouse (GII) 1253913 & Barn 1253914	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. 'Wick Farmhouse' (1253913) and 'Barn Adjacent to Road at Wick Farm' (1253914) were assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.4.757 – 58. "*The farmhouse is set back from the road, which is lined by a thick hedge, by a courtyard area and farm complex. The house is almost hidden from the road by large barns, included the listed barn. […] Surrounding the assets are agricultural fields. […] Aside from the quarry and later barns, the historical settings of the assets have little changed. Overall, the farmhouse setting makes a considerable contribution to its value and the barn setting makes a moderate contribution to its value. Due to their proximity to the Order Limits the assets' setting extends into the Order Limits*". Listed Buildings were assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** pages 126-127 and 1052-1053 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 87 and 257. Due to screening by mature vegetation and buildings, the Project would only be occasionally visible. The Project would result in a small change to the setting of the asset, but due to the partial screening, there would be a low impact on the value of the asset. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment.

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
	The Applicant believes its assessment is proportional and appropriate.
Fordstreet CA	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. Fordstreet CA was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.5.29 - 31 The assets setting plays a crucial role in enhancing its value, except the industrial part to its south-west. Due to the proximity with the Order Limits, between 25m and 50m, the setting of the conservation area, therefore, extends to the Order Limits. The Conservation Area was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** pages 196-197 and 1133-1134 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 124 and 285-286. The setting of the asset would be affected by the installation of pylons TB48 to TB52.The pylons may be visible from within the asset, particularly from the east and north-east c.250 m away. Woodland surrounding the exterior of the asset in the southern portion of the asset would break up views from the south of the conservation area towards the Project, while in the northern portion of the asset a mix of mature vegetation and buildings would break up views towards the Project. The assessments findings were medium impact and that the asset would experience Mid Less Than Substantial Harm. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the ‘five-step’ approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment (see **7.12 Visualisations - Part 9 of 9 [APP-351] F234_HE26**). The Applicant believes its assessment is proportional and appropriate.

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
Listed Buildings in the Conservation Area	
Barn To South East Of Friars Farmhouse' (GII) (1239835),	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. The Grade II listed 'Barn To South East Of Friars Farmhouse' (1239835) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.5.372 - 3.5.373 alongside several other buildings within the Fordstreet Conservation Area. "*Their setting is informed by their location in the settlement and especially by their roadside location. The road is the A1134, a busy road. Their setting is mostly residential but with fields further afield. Their setting is also informed by their relationship with each other and with the Conservation Area. The assets are mostly visible on the first edition OS map of 1881. Since the first edition, the settlement has grown a little during the 20th century, particularly south-west and north-west, but in general and even today, Fordstreet has retained its rural nature surrounded by fields. Therefore, their setting makes a considerable contribution to their value but does not extend to the Order Limits*." Although the asset is acknowledged to gain considerable value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.
Friars Farmhouse' (1267731),	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. 'Friars Farmhouse' (1267731) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.5.372 - 3.5.373 alongside several other buildings within the Fordstreet Conservation Area. *"Their setting is informed by their location in the settlement and especially by their roadside location. The road is the A1134, a busy road. Their setting is mostly residential but with fields further afield. Their setting is also informed by their relationship with each other and with the Conservation Area. The assets are mostly visible on the first edition OS map of*

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
	1881. Since the first edition, the settlement has grown a little during the 20th century, particularly south-west and north-west, but in general and even today, Fordstreet has retained its rural nature surrounded by fields. Therefore, their setting makes a considerable contribution to their value but does not extend to the Order Limits." Although the asset is acknowledged to gain considerable value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.
Fordstreet Bridge (1273567)	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. 'Fordstreet Bridge' (1273567) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.5.372 - 3.5.373 alongside several other buildings within the Fordstreet Conservation Area. "*Their setting is informed by their location in the settlement and especially by their roadside location. The road is the A1134, a busy road. Their setting is mostly residential but with fields further afield. Their setting is also informed by their relationship with each other and with the Conservation Area. The assets are mostly visible on the first edition OS map of 1881. Since the first edition, the settlement has grown a little during the 20th century, particularly south-west and north-west, but in general and even today, Fordstreet has retained its rural nature surrounded by fields. Therefore, their setting makes a considerable contribution to their value but does not extend to the Order Limits."* Although the asset is acknowledged to gain considerable value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
	in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.
'Riverdale Cottage' (1110891)	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. 'Riverdale Cottage' (1110891) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.5.372 - 3.5.373 alongside several other buildings within the Fordstreet Conservation Area. "*Their setting is informed by their location in the settlement and especially by their roadside location. The road is the A1134, a busy road. Their setting is mostly residential but with fields further afield. Their setting is also informed by their relationship with each other and with the Conservation Area. The assets are mostly visible on the first edition OS map of 1881. Since the first edition, the settlement has grown a little during the 20th century, particularly south-west and north-west, but in general and even today, Fordstreet has retained its rural nature surrounded by fields. Therefore, their setting makes a considerable contribution to their value but does not extend to the Order Limits*." Although the asset is acknowledged to gain considerable value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.
The 'Queen's Head' Public House' (1110886)	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. The 'Queen's Head' Public House' (1110886) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.5.372 - 3.5.373 alongside several other buildings within the Fordstreet

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
	Conservation Area. "*Their setting is informed by their location in the settlement and especially by their roadside location. The road is the A1134, a busy road. Their setting is mostly residential but with fields further afield. Their setting is also informed by their relationship with each other and with the Conservation Area. The assets are mostly visible on the first edition OS map of 1881. Since the first edition, the settlement has grown a little during the 20th century, particularly south-west and north-west, but in general and even today, Fordstreet has retained its rural nature surrounded by fields. Therefore, their setting makes a considerable contribution to their value but does not extend to the Order Limits*." Although the asset is acknowledged to gain considerable value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.
Aldham Carpentry (1110888)	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments.'Aldham Carpentry' (1110888) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.5.372 - 3.5.373 alongside several other buildings within the Fordstreet Conservation Area. "*Their setting is informed by their location in the settlement and especially by their roadside location. The road is the A1134, a busy road. Their setting is mostly residential but with fields further afield. Their setting is also informed by their relationship with each other and with the Conservation Area. The assets are mostly visible on the first edition OS map of 1881. Since the first edition, the settlement has grown a little during the 20th century, particularly south-west and north-west, but in general and even today, Fordstreet has retained its rural nature surrounded by fields. Therefore, their setting makes a considerable contribution to their value but does not extend to the Order Limits*." Although the asset is acknowledged to gain considerable value from its setting, it does not

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
	extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.
The Bunches' (1110892)	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. 'The Bunches' (1110892) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.5.372 - 3.5.373 alongside several other buildings within the Fordstreet Conservation Area. "*Their setting is informed by their location in the settlement and especially by their roadside location. The road is the A1134, a busy road. Their setting is mostly residential but with fields further afield. Their setting is also informed by their relationship with each other and with the Conservation Area. The assets are mostly visible on the first edition OS map of 1881. Since the first edition, the settlement has grown a little during the 20th century, particularly south-west and north-west, but in general and even today, Fordstreet has retained its rural nature surrounded by fields. Therefore, their setting makes a considerable contribution to their value but does not extend to the Order Limits*." Although the asset is acknowledged to gain considerable value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
Ferndale and Valley House' (1337410)	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. 'Ferndale and Valley House' (1337410) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.5.372 - 3.5.373 alongside several other buildings within the Fordstreet Conservation Area. "*Their setting is informed by their location in the settlement and especially by their roadside location. The road is the A1134, a busy road. Their setting is mostly residential but with fields further afield. Their setting is also informed by their relationship with each other and with the Conservation Area. The assets are mostly visible on the first edition OS map of 1881. Since the first edition, the settlement has grown a little during the 20th century, particularly south-west and north-west, but in general and even today, Fordstreet has retained its rural nature surrounded by fields. Therefore, their setting makes a considerable contribution to their value but does not extend to the Order Limits*." Although the asset is acknowledged to gain considerable value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.
Rose Cottage' (1110883)	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. 'Rose Cottage' (1110883) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.5.372 - 3.5.373 alongside several other buildings within the Fordstreet Conservation Area. "*Their setting is informed by their location in the settlement and especially by their roadside location. The road is the A1134, a busy road. Their setting is mostly residential but with fields further afield. Their setting is also informed by their relationship with each other and with the Conservation Area. The assets are mostly visible on the first edition OS map of 1881. Since the first edition, the settlement has grown a little during the 20th century, particularly south-west and north-west, but in general and even today, Fordstreet has retained its rural nature*

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
	surrounded by fields. Therefore, their setting makes a considerable contribution to their value but does not extend to the Order Limits." Although the asset is acknowledged to gain considerable value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.
Fore Acres' (1110889)	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. 'Fore Acres' (1110889) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.5.372 - 3.5.373 alongside several other buildings within the Fordstreet Conservation Area. "*Their setting is informed by their location in the settlement and especially by their roadside location. The road is the A1134, a busy road. Their setting is mostly residential but with fields further afield. Their setting is also informed by their relationship with each other and with the Conservation Area. The assets are mostly visible on the first edition OS map of 1881. Since the first edition, the settlement has grown a little during the 20th century, particularly south-west and north-west, but in general and even today, Fordstreet has retained its rural nature surrounded by fields. Therefore, their setting makes a considerable contribution to their value but does not extend to the Order Limits.*" Although the asset is acknowledged to gain considerable value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
	by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.
Cooks Mill House (1225093)	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. The Grade II listed 'Cooks Mill House' (1225093) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.5.374 - 3.5.375. "*The setting is informed by its location within a farm complex, encompassed by agricultural fields and woodlands to the south and west. While the setting enhances the property's appeal, the presence of mature trees limits visibility of the Project from the house, although it may become more visible during the autumn and winter season. Overall, the setting does not appear to have been altered and therefore makes a considerable contribution to the value of this asset, and it does not extend to the Order Limits.*" Although the asset is acknowledged to gain considerable value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.
Archaeology	
Roman hunting lodge at Fordham (4081) and Roman site at Fossets Lane	Pylon TB47 was moved north-east to avoid direct physical impact to the archaeological site in this area. The new location for pylon TB47 has been geophysically surveyed, with no results of note, and will be evaluated by archaeological trial trenching to determine if mitigation is required. The setting of the asset has been acknowledged in the assessment **[APP-209] – 3.5.88** including the views towards Colchester and based on the asset value the impacts are deemed to be accurate following the impact assessment methodology.

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
	Landscape and visual effects on the same stretch are illustrated by general LVIA Viewpoints 4.20, 4.24, 4.25 and 4.27 (**7.12 Visualisations - Part 5 of 9 [APP-347]**) and by Heritage Viewpoint HE 26 (photomontage) (**7.12 Visualisations - Part 9 of 9 [APP-351]**), which together confirm that the amended alignment minimises intrusion into key views. The Applicant fully recognises the importance of safeguarding archaeological remains of national significance, and our approach is aligned with this principle. The approach set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** and secured through Requirement 5 within **3.1 Draft Development Consent Order [APP-056]** already includes provision for a range of mitigation strategies, including preservation in situ, should highly significant remains be identified.
White Notley Conservation Area	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. White Notley CA was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.6.22 - 23. "*The setting of the conservation area is informed by the relationships between the listed buildings and the non-designated buildings that contribute to the character of the asset. [...] The setting of the asset is further informed by the surrounding agricultural landscape with which it has a historical relationship. The link to the wider landscape has, however, been eroded by 20th century residential development, although this is maintained by the views of the Brain Valley and the landscape beyond. The setting of the conservation area makes a considerable contribution to its value but due to its largely internal focus and modern residential development on the southern edge of the settlement, the setting does not extend to the Order Limits*." The photomontage used by the respondent (see **7.12 Visualisations - Part 5 of 9 [APP-343]** Viewpoint 5.04) is located c.85m southeast outside of the Conservation Area in an area separated by the aforementioned 20th century development (see **7.12 Visualisations - Part 5 of 9 [APP-343]** Viewpoint 5.04 - 7.12.F139_VP5.04f). An additional heritage viewpoint located adjacent to the western edge of the Conservation Area is provided in **7.12 Visualisations - Part 8 of 9 [APP-350]** F221_HE14. Although the asset is acknowledged to derive considerable value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental**

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
	Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment (see **7.12 Visualisations - Part 8 of 9 [APP-350]** F221_HE14). The Applicant believes its assessment is proportional and appropriate.
Kelvedon CA	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. Kelvedon CA was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.6.28 - 29. "*The setting of the conservation area is informed by its focus on the fossilised medieval street plan and by the relationships between the listed buildings and by their relationships with the non-designated building stock that contributes to the character of the conservation area. The asset is largely enclosed by 20th and 21st century development and some later development within detracts from the character of the conservation area. The setting of the asset, therefore, makes a moderate contribution to its value, but due to its enclosed nature, the setting does not extend to the Order Limits*." Although the asset is acknowledged to derive moderate value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.
Great Tey CA	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. Great Tey CA was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.5.33 - 34. "*The conservation*

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
	area is situated within an urban setting, characterised by extensive views from both the north-east and south-east directions. Within its immediate surroundings, several smaller green spaces enhance its overall value. While the setting undeniably contributes significantly to its worth, it remains contained within the conservation area's boundaries, not extending to the Order Limits due to its somewhat insular nature." Although the asset is acknowledged to derive considerable value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment (see **7.12 Visualisations - Part 4 of 9 [APP-346]** Viewpoint 4.10). The Applicant believes its assessment is proportional and appropriate.
Great Waltham CA	The matter concerning the assessment of Great Waltham CA has already been addressed. Please see comment REP1-191 of **8.8.1 Applicant's Comments on Written Representations [REP2-029]**, pages 82-83.
Little Waltham CA	The matter concerning the assessment of Little Waltham CA has already been addressed. Please see comment REP1-191 of **8.8.1 Applicant's Comments on Written Representations [REP2-029]**, pages 81-82.
Listed Buildings in the Conservation Area	
42 The Street (1152026),	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. 42 The Street (1152026) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** 3.7.368 - 69. "*The setting of the listed buildings within the Little Waltham Conservation Area is informed by their interrelationships with the assets identified by Historic England as being part of their asset group. [...] The setting of the assets, particularly of those on the western and northern sides of The Street, is further informed by the Chelmer river valley and its flanking pastoral*

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
	land with which the settlement is intrinsically linked, although the B1008 has detrimentally affected this relationship. The setting of the assets, therefore, makes a considerable contribution the value of the assets." The asset was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** pages 271 and 1145-1146 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 167 and 318. The Project would be partially located within the setting of the medium value asset. However, due to screening by mature vegetation, buildings, and infrastructure, the Project would only be occasionally visible. As the Project would result in a slight change to the setting of the asset due to the partial screening, there would be a negligible impact on the value of the asset. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm. The Applicant's conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment (see **7.12 Visualisations - Part 9 of 9 [APP-351]** Viewpoint HE31). The Applicant believes its assessment is proportional and appropriate.
36 - 40 The Street (1122025),	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. 36 - 40 The Street (1122025) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** 3.7.368 - 69. "*The setting of the listed buildings within the Little Waltham Conservation Area is informed by their interrelationships with the assets identified by Historic England as being part of their asset group. [...] The setting of the assets, particularly of those on the western and northern sides of The Street, is further informed by the Chelmer river valley and its flanking pastoral land with which the settlement is intrinsically linked, although the B1008*

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
	has detrimentally affected this relationship. The setting of the assets, therefore, makes a considerable contribution the value of the assets." The asset was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** pages 272 and 1146 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 167 and 319. The Project would be partially located within the setting of the medium value asset. However, due to screening by mature vegetation, buildings, and infrastructure, the Project would only be occasionally visible. As the Project would result in a slight change to the setting of the asset due to the partial screening, there would be a negligible impact on the value of the asset. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm. The Applicant's conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment (see **7.12 Visualisations - Part 9 of 9 [APP-351]** Viewpoint HE31). The Applicant believes its assessment is proportional and appropriate.
The Bell Public House (1122024)	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. The The Bell Public House (1122024) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** 3.7.368 - 69. "*The setting of the listed buildings within the Little Waltham Conservation Area is informed by their interrelationships with the assets identified by Historic England as being part of their asset group. [...] The setting of the assets, particularly of those on the western and northern flanks of The Street, is further informed by the Chelmer river valley and its flanking pastoral land with which the settlement is intrinsically linked, although the B1008 has detrimentally affected this relationship. The setting of the assets, therefore, makes a*

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
	considerable contribution the value of the assets." The asset was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** pages 272-273 and 1146-1147 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 167 and 319. The Project would be partially located within the setting of the medium value asset. However, due to screening by mature vegetation, buildings, and infrastructure, the Project would only be occasionally visible. As the Project would result in a slight change to the setting of the asset due to the partial screening, there would be a negligible impact on the value of the asset. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm. The Applicant's conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment (see **7.12 Visualisations - Part 9 of 9 [APP-351]** Viewpoint HE31). The Applicant believes its assessment is proportional and appropriate.
30 The Street (1122023),	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments.30 The Street (1122023) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** 3.7.368 - 69. "*The setting of the listed buildings within the Little Waltham Conservation Area is informed by their interrelationships with the assets identified by Historic England as being part of their asset group. [...] The setting of the assets, particularly of those on the western and northern flanks of The Street, is further informed by the Chelmer river valley and its flanking pastoral land with which the settlement is intrinsically linked, although the B1008 has detrimentally affected this relationship. The setting of the assets, therefore, makes a considerable contribution the value of the assets*." The asset was assessed in **6.11.A2 Environmental**

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
	Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] page 273 and 1147 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 168 and 319. The Project would be partially located within the setting of the medium value asset. However, due to screening by mature vegetation, buildings, and infrastructure, the Project would only be occasionally visible. As the Project would result in a slight change to the setting of the asset due to the partial screening, there would be a negligible impact on the value of the asset. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm. The Applicant's conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment (see **7.12 Visualisations - Part 9 of 9 [APP-351]** Viewpoint HE31). The Applicant believes its assessment is proportional and appropriate.
The Limes (1122022),	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. The Limes (1122022) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** 3.7.368 - 69. "*The setting of the listed buildings within the Little Waltham Conservation Area is informed by their interrelationships with the assets identified by Historic England as being part of their asset group. [...] The setting of the assets, particularly of those on the western and northern sides of The Street, is further informed by the Chelmer river valley and its flanking pastoral land with which the settlement is intrinsically linked, although the B1008 has detrimentally affected this relationship. The setting of the assets, therefore, makes a considerable contribution the value of the assets*." The asset was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** pages 274 and 1147-1148 and **6.11.A7 Environmental Statement Appendix 11.7 -**

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
	Assessment of Harm to Designated Heritage Assets [APP-215] page 168 and 319. The Project would be partially located within the setting of the medium value asset. However, due to screening by mature vegetation, buildings, and infrastructure, the Project would only be occasionally visible. As the Project would result in a slight change to the setting of the asset due to the partial screening, there would be a negligible impact on the value of the asset. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm. The Applicant's conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment (see **7.12 Visualisations - Part 9 of 9 [APP-351]** Viewpoint HE31). The Applicant believes its assessment is proportional and appropriate.
Oxford House (1122055),	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. 'Oxford House' (1122055) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** 3.7.368 - 69. "*The setting of the listed buildings within the Little Waltham Conservation Area is informed by their interrelationships with the assets identified by Historic England as being part of their asset group. [...] The setting of the assets, particularly of those on the western and northern sides of The Street, is further informed by the Chelmer river valley and its flanking pastoral land with which the settlement is intrinsically linked, although the B1008 has detrimentally affected this relationship. The setting of the assets, therefore, makes a considerable contribution the value of the assets.* "The asset was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** pages 274-275 and 1148 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 168 and 320. The Project would be partially located within the setting of the medium value asset. However, due to screening

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
	by mature vegetation, buildings, and infrastructure, the Project would only be occasionally visible. As the Project would result in a slight change to the setting of the asset due to the partial screening, there would be a negligible impact on the value of the asset. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm. The Applicant's conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment (see 7**.12 Visualisations - Part 9 of 9 [APP-351]** Viewpoint HE31). The Applicant believes its assessment is proportional and appropriate.
37 The Street' (1122054),	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments.37 The Street (1122054) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] 3.7.368 - 69**. "*The setting of the listed buildings within the Little Waltham Conservation Area is informed by their interrelationships with the assets identified by Historic England as being part of their asset group. [...] The setting of the assets, particularly of those on the western and northern sides of The Street, is further informed by the Chelmer river valley and its flanking pastoral land with which the settlement is intrinsically linked, although the B1008 has detrimentally affected this relationship. The setting of the assets, therefore, makes a considerable contribution the value of the assets*." The asset was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** pages 275-276 and 1148 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 169 and 320. The Project would be partially located within the setting of the medium value asset. However, due to screening by mature vegetation, buildings, and infrastructure, the Project would only be occasionally visible. As the Project would result in a slight change to the setting of the asset due to the partial screening, there would be a negligible impact on the value of the asset. It is

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
	concluded, therefore, that the asset would experience Lower Less Than Substantial Harm. The Applicant's conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment (see **7.12 Visualisations - Part 9 of 9 [APP-351]** Viewpoint HE31). The Applicant believes its assessment is proportional and appropriate.
Millstone Cottage (1151939)	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. Millstone Cottage (1151939) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** 3.7.162-164 and 3.7.368 - 69. "*The setting of the listed buildings within the Little Waltham Conservation Area is informed by their interrelationships with the assets identified by Historic England as being part of their asset group. [...] The setting of the assets, particularly of those on the western and northern sides of The Street, is further informed by the Chelmer river valley and its flanking pastoral land with which the settlement is intrinsically linked, although the B1008 has detrimentally affected this relationship. The setting of the assets, therefore, makes a considerable contribution the value of the assets*." The asset was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** pages 247-248 and 1129 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** pages 155 and 307-308. The Project is located at the limit of the asset's setting and due to some screening by mature vegetation, buildings, and infrastructure, the Project would only be occasionally visible. The Project would result in a small change to the setting of the asset, but due to overall distance and the partial screening, there would be a low impact on the value of the asset. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm.

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
	The Applicant's conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment (see **7.12 Visualisations - Part 9 of 9 [APP-351]** Viewpoint HE31). The Applicant believes its assessment is proportional and appropriate.
Two Gates (1151949)	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. Two Gates (1151949) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.7.368 - 369. "*The setting of the listed buildings within the Little Waltham Conservation Area is informed by their interrelationships with the assets identified by Historic England as being part of their asset group. [...] The setting of the assets, particularly of those on the western and northern sides of The Street, is further informed by the Chelmer river valley and its flanking pastoral land with which the settlement is intrinsically linked, although the B1008 has detrimentally affected this relationship. The setting of the assets, therefore, makes a considerable contribution the value of the assets*." The asset was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** page 275 and 1148 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 169 and 320. The Project would be partially located within the setting of the medium value asset. However, due to screening by mature vegetation, buildings, and infrastructure, the Project would only be occasionally visible. As the Project would result in a slight change to the setting of the asset due to the partial screening, there would be a negligible impact on the value of the asset. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm. The Applicant's conclusion has been informed by following best practice and guidance as

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
	per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment (see **7.12 Visualisations - Part 9 of 9 [APP-351]** Viewpoint HE31). The Applicant believes its assessment is proportional and appropriate.
Marshalls Cottages (GII*) (1337058)	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. It should be noted for clarity that Marshall's Cottages' (1337058) is located in the parish of West Tilbury, rather than the Little Waltham Conservation Area stated in Appendix F. The asset was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.9.145 - 3.9.146. The high evergreen hedges and trees that surround and provide a boundary to the property of the asset, and as such the setting of the asset is set within the bounds of the property. The farm complex on the east side of Blue Anchor Lane provides considerable screening between the asset and the Project, but due to the proximity of the Order Limits, it is likely the construction phase of the Project would introduce noise and perhaps glimpses of plant movement into the setting. The asset was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** pages 329 and 1189-1190 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 169 and 348. During both the construction and operation phase, the Project would be partially within the setting of the high value asset. However, due to screening by vegetation and buildings, the Project would only be occasionally visible. The Project would result in a small change to the setting of the asset, but due to the partial screening, there would be a low impact on the value of the asset. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm. The Applicant's conclusion has been informed by following best practice and guidance as

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
	per the assessment methodology in 6.11.A1 Environmental Statement **Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - **Annex C, 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.
Margaretting CA	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. Margaetting CA was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.8.18 - 19. The conservation area is focused on the green space of the Peacock Estate parkland and Parsonage Farm combined, and includes the non-designated Peacocks Homestead model Farm, and Evelands Hall north of Main Road and a portion of the thoroughfare itself. "*The setting of the parkland is almost entirely insular as views in and out are extremely rare and broken by vegetation if glimpsed at all. [...] The setting of the conservation area, therefore, is somewhat disjoined and so makes a moderate contribution to its value, but due to its largely insular nature, and the intervening A12 dual carriageway, located between the conservation area and the Order Limits, the setting does not extend to the Order Limits*." Although the asset is acknowledged to derive moderate value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
Hutton Village CA	The matter concerning the assessment of Hutton CA has already been addressed. Please see comment 6.49-50 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**, pages 433-434.
Little Burstead CA	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. Little Burstead CA was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.8.43 – 47. "*Although there are few views out of the village, mainly due to trees and topography, the conservation area does overlook an area to the south-west towards and into the Order Limits. Without the agricultural environment and peaceful nature the historical and aesthetic value would be reduced. Overall, the setting makes a considerable contribution to the value of the conservation area*. "The Conservation Area was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** pages 312 and 1214 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 190 and 339. The Project would be partially within the setting of the medium value asset. However, due to screening by mature vegetation and buildings, but also distance, the Project would only be occasionally visible. The Project would result in a small change to the setting of the asset, but due to the partial screening, there would be a negligible impact on the value of the asset and that the asset would experience Lower Less Than Substantial Harm. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment The Applicant believes its assessment is proportional and appropriate.

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
West Tilbury CA	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. West Tilbury CA was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.9.27 – 3.9.30. The setting of the conservation area makes a considerable contribution to its value and due to the proximity of the Project, the setting extends to the Order Limits. The Conservation Area was assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** pages 332-333 and 1192 and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** pages 201 and 349. During the operation phase, the Project would be partially within the setting of the high value asset. However, due to screening by vegetation, the Project would only be occasionally visible. The Project would result in a small change to the setting of the asset, but due to the partial screening, there would be a low impact on the value of the asset. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm. The assessment put forward by the Responder makes reference to an out-of-date design route. The route no longer passes through the conservation area, and is further from the asset. The **5.15 Design Development Report [APP-122]** and the **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]** page 76 detail the changes to the Project following the 2024 statutory consultation and 2025 targeted consultations. The changes included connecting electrically to Tilbury Substation via a new substation (Tilbury North) connected to the existing Tilbury Substation via a modification to the 400 kV YYJ line, rather than into the Freeport area. The alternative connection arrangement was developed following consultation feedback and technical review identifying challenges with the Freeport interaction and development constraints. In all cases, factors relevant to the change have been considered (which can be multiple and potentially conflicting) and a balanced decision made taking into account environmental (including the historic environment) and socio-economic effects, engineering feasibility and risks, cost and programme amongst other factors. The Applicant's conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C and **6.11.A7**

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
	Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment The Applicant believes its assessment is proportional and appropriate.
Listed Buildings in the Conservation Area	
'The Bakery' (1111634)	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. The Grade II listed 'The Bakery' (1111634) was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.9.265 - 3.9.266. "*The setting of the asset is informed by the characterful and historic village centre but also to the surrounding agricultural landscape which was a key element to the historic activity of the settlement. The name of the bakery illudes to its function within the community of the village and the service it provided to the settlement. The setting of the asset is focused on its village green setting and so it does not extend to the Order Limits*". Although the asset is acknowledged to gain considerable value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment.
'Holford Farm (8089) NDHA	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. The undated cropmark complex (8089) on farmland north of Rectory Road was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.9.330 - 3.9.331. "*The setting of the asset is informed by*

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
	the surrounding agricultural landscape, which likely shares characteristic of the asset's contemporary environment. This landscape has, however, been significantly impacted by modern development, infrastructure, and mineral extraction, and so the setting makes minor contribution to its value of the asset. The setting of the asset does not extend to the Order Limits". The asset is acknowledged to derive minor value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.
'Manor Farm' (8086) NDHA	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. The undated cropmark complex (8086) on land at Manor Farm was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.9.332 - 3.9.333. "*The setting of the asset is informed by the surrounding agricultural landscape, which likely shares characteristic of the asset's contemporary environment. This landscape has, however, been significantly impacted by modern development, infrastructure, and mineral extraction, and so the setting makes minor contribution to its value of the asset. The setting of the asset does not extend to the Order Limits*." The asset is acknowledged to derive minor value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
	by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.
'Wick House' (8100) NDHA	The Applicant has not assessed the non-designated asset Wick House due to its distance outside the Order Limits and the Study Area agreed with consultees within the scoping report, see **6.19 Scoping Report - including appendices B to K [APP-296]**. The assessment put forward by the Responder to include Milton Place refers to an out-of-date design route in this area. The **5.15 Design Development Report [APP-122]** and the **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]** page 76 detail the changes to the Project following the 2024 statutory consultation and 2025 targeted consultations. The changes included connecting electrically to Tilbury Substation via a new substation (Tilbury North) connected to the existing Tilbury Substation via a modification to the 400 kV YYJ line, rather than into the Freeport area. The alternative connection arrangement was developed following consultation feedback and technical review identifying challenges with the Freeport interaction and development constraints. In all cases, factors relevant to the change have been considered (which can be multiple and potentially conflicting) and a balanced decision made taking into account environmental (including the historic environment) and socio-economic effects, engineering feasibility and risks, cost and programme amongst other factors. All non-designated heritage assets (NDHA) within the Study Area were assessed to determine their value in accordance with **6.19 Scoping Report [APP-288 – APP-296], 6.20 Scoping Opinion [APP-297]** and the methodology set out in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** - 11.4.2 page 26-27. The settings of all negligible and low value non-designated assets have not been assessed due to the lack of potential for any impacts to these assets to result in significant effects.
East Tilbury	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. East Tilbury CA was assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.9.31 - 3.9.33. "*The setting of the conservation area is informed the relationships between the factory buildings and housing, by the uniformity of the architecture for the two elements and by the planned nature of the settlement. The setting is further informed by views of the*

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
	surrounding rural landscape, although this has been eroded to the east by later 20th century residential development. [...] The setting of the conservation area makes a considerable contribution to its value, but due to its insular nature, the setting does not extend to the Order Limits." Although the asset is acknowledged to derive considerable value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.
Milton Place CA	The Applicant has not assessed Milton Place CA as part of the scheme, as it is located within Gravesend, beyond both the 2km and 3km Study Area for designated heritage assets agreed with consultees within the scoping report, see **6.19 Scoping Report - including appendices B to K [APP-296]** 11.3.1-3 page 150. The assessment put forward by the Responder to include Milton Place refers to an out-of-date design route in this area. The **5.15 Design Development Report [APP-122]** and the **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]** page 76 detail the changes to the Project following the 2024 statutory consultation and 2025 targeted consultations. The changes included connecting electrically to Tilbury Substation via a new substation (Tilbury North) connected to the existing Tilbury Substation via a modification to the 400 kV YYJ line, rather than into the Freeport area. The alternative connection arrangement was developed following consultation feedback and technical review identifying challenges with the Freeport interaction and development constraints. In all cases, factors relevant to the change have been considered (which can be multiple and potentially conflicting) and a balanced decision made taking into account environmental (including the historic environment) and socio-economic effects, engineering feasibility and risks, cost and programme amongst other factors.

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
'Circular Brick Kilns at W H Collier Brick and Tile Works' 1020999 Scheduled Monument	The Applicant has reviewed the assessment of the asset in light of the Respondent's comments. The Circular Brick Kilns at W H Collier Brick and Tile Works (1020999) were assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.5.414 - 3.5.416. "*The setting of this schedule monument is primarily informed by its rural context and location on a private road, contributing to a serene environment. Further south is the A12 and other industrial activities, but the woodland surrounding the schedule monument acts as a buffer and preserves the asset. Therefore, the setting of the 'Circular Brick Kilns at W H Collier Brick and Tile Works' schedule monument makes a considerable contribution to its value and does not extend to the Order Limits*." Although the asset is acknowledged to derive considerable value from its setting, it does not extend to the Order Limits. This was conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment. The Applicant believes its assessment is proportional and appropriate.
Cressing Temple Scheduled monument and 2 barns (GI)	The Applicant has reviewed the assessment of the assets in light of the Respondent's comments. The Cressing Temple Scheduled Monument (1002122) and two Grade I Listed Barns (1123865, 1123866) were assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - 3.6.104-3.6.107. The setting of the scheduled monument and listed buildings, is shared and informed by their interrelationships and by the surrounding agricultural landscape. It makes a considerable contribution to their values, and extends to the Order Limits. The assets were assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** pages 200, 211-213, 1098 and 1106-1107, and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** pages 125, 132-133, 286-287 and 291-292. During the operation phase, the Project would be partially within the setting of the high value asset.

Asset Name/ID cited in Table 3 [REP3-134]	NG Response
	However, due to screening by mature vegetation and buildings, the Project would only be occasionally visible. The Project would result in a small change to the setting of the asset, but due to the partial screening, there would be a negligible impact on the value of the asset. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm. The Applicant notes that the viewshed utilised by the Respondent (see **7.12 Visualisations - Part 6 of 9 [APP-348]** Viewpoint 5.11) to inform their comment omits to include the full image, and thus additional screening located to the northeast and southwest of the images. The Applicants assessment has taken this screening into account in its assessment. The Applicant also notes the second viewshed utilised is located at the PRoW in Faulkbourne, c.1.35km south of Cressing Temple (see **7.12 Visualisations - Part 6 of 9 [APP-348]** Viewpoint 5.12). The Applicant's conclusion has been informed by following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** - Annex C, **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** page 6. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), utilising the 'five-step' approach given in part 2 of the good practice advice. The assessment of setting and impacts have been further informed by site visits, aerial and street-view imagery, and viewpoint assessment (see **7.12 Visualisations - Part 6 of 9 [APP-348]** Viewpoint 5.11). The Applicant believes its assessment is proportional and appropriate.

6. Applicant's Comments on PEA Appendix G - Heritage Impact Supporter appraisals [REP3-135]

6.1.1 The Applicant provides its comments on Appendix G of the PEA Response [REP3-135] below. This document was submitted as an Excel spreadsheet and therefore the Applicant has extracted the information into a Word tabular format in order to respond.

Table 6.1 Applicant's Comments on PEA Appendix G [REP3-135]

Matter	Applicant Response
Bleak Hall Somersham 2. What is the asset (church, house, ruin etc)? House No assessment of the harm to our listed property has been considered by National Grid. They plan to site a pylon right next to our grade2 listed building. 6. Has National Grid scoped out any heritage assets that you feel should be scoped in? Please list. They had not got our property as a listed building! 7. Is there anything else you would like to add? NG have ignored the Holford rules by putting in two doglegs to bring the route right beside our heritage property and we are at a highpoint on the landscape. It is to the detriment of the setting of Bleak Hall regards the landscape and the surrounding amenity. No mitigation no consideration or consultation by NG to find a solution that respects the historical importance of our property.	The Applicant notes the concern raised about the Bleak Hall Somersham asset (likely Bleak Hall, 1251669 – Grade II) and confirms that this asset has been assessed through all the process, including the assessment of harm in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**. During the construction phase, the asset would experience a moderate change to its setting with a high impact on its value, resulting in Mid Less Than Substantial Harm. Across the operation phase, there would be a further moderate change to the setting with a medium impact on value, again resulting in Mid Less Than Substantial Harm. Also, mitigation for this asset has been detailed by the Applicant in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** (pages 349–350), where we provide a full and explicit description of the measures selected to address potential impacts on Bleak Hall Somersham. Therefore, the Applicant is confident that the Bleak Hall Somersham asset (1251669, Grade II) has been appropriately considered within the Environmental Statement framework.

Matter	Applicant Response
Dines Hall 1123448 2. What is the asset (church, house, ruin etc)? House The listed building along either historic moat raises no concern regarding the impact of drainage of said moat which runs directly within the proposed haul roads/works. No Mitigation regarding the damage or impact of disturbing the the existing drainage field. 6. Has National Grid scoped out any heritage assets that you feel should be scoped in? Please list. Most	The Applicant notes the concern raised about the drainage moat and its relation to proposed haul roads. In the current plan, haul roads are designed to minimise interaction with sensitive features, with bypass routes and temporary crossings used to avoid constraints and drainage infrastructure where practical. Mitigation for any potential disturbance to drainage features and near-surface archaeology remains governed by the **7.2 Outline Code of Construction Practice [Revision D]** and the **7.4 Outline Landscape and Ecological Management Plan [REP3-030]**. Any necessary mitigation, monitoring, and recording would be implemented under the Development Consent Order process in coordination with Historic England and Local Planning Authorities, ensuring alignment with the mitigation hierarchy and the policy framework. Also, a full detail of mitigations for Dines Hall listed building (1123448) has been provided in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** (pages 375–376).
Bleak Hall Somersham Suffolk 2. What is the asset (church, house, ruin etc)? House Bleak hall is not listed as a heritage asset, the property listed as grade 2 built in 1543. It overlooks the village of Somersham residing in the valley below. The property is a landmark for the area, in 2000 the property was registered as a listed property at risk. During 2007-2018 the property was renovated and restored to its former glory. 6. Has National Grid scoped out any heritage assets that you feel should be scoped in? Please list. Bleak Hall has been excluded as a heritage building in the NG plans. 7. Is there anything else you would like to add?	The Applicant notes the concern raised about the Bleak Hall Somersham asset (likely Bleak Hall, 1251669 – Grade II) and confirms that this asset has been assessed through all the process, including the assessment of harm in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**. During the construction phase, the asset would experience a moderate change to its setting with a high impact on its value, resulting in Mid Less Than Substantial Harm. Across the operation phase, there would be a further moderate change to the setting with a medium impact on value, again resulting in Mid Less Than Substantial Harm. Also, mitigation for this asset has been detailed by the Applicant in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** (pages 349–350), where we provide a full and explicit description of the measures selected to address potential impacts on Bleak Hall Somersham. Therefore, the Applicant is confident that the Bleak

Matter	Applicant Response
The year the property was built in 1543 in king henrys tudor england the property since this time a number of historic events have occurred. 1540–1600 (Reformation & Exploration): Execution of Thomas Cromwell (1540), Henry VIII's reign, Mary Queen of Scots ascends (1542), Francis Drake completes circumnavigation (1580), Defeat of the Spanish Armada (1588). 1600–1700 (Revolution & Restoration): Death of Elizabeth I (1603), English Civil War (1642–1651), Restoration of the Monarchy (1660), Great Fire of London (1666), Glorious Revolution (1688). 1700–1800 (Enlightenment & Revolutions): Act of Union (1707), Industrial Revolution begins (c. 1760), American Declaration of Independence (1776), French Revolution begins (1789). 1800–1900 (Empire & Industry): Napoleonic Wars/Battle of Waterloo (1815), Victorian Era (1837-1901), Crimean War (1854-1856). 1900–2000 (Global Conflict & Technology): World War I (1914–1918), World War II (1939–1945), Indian Independence (1947), Civil Rights marches (1965), Fall of the Berlin Wall (1989), End of Apartheid (1994). 2000–2026 (Digital Age & Modern Era): 9/11 attacks (2001), Global Financial Crisis (2008), Rise of AI and smartphones, COVID-19 pandemic (2020), Continued global technological and political shifts (2025–2026). Our property has survived throughout these historic years residing on the hill top over looking the valley as a historic point of reference for the local community surrounded by open fields. The surrounding country side is free of any noise pollution and is on a walking route for the village and walkers taking in the views and the countryside. Our house is often discussed as a feature of the village a land mark and the house that everyone wants to own. The emotional and phycological impact of the NG project and the ignorance of ignoring this property in is listing as a heritage building	Hall Somersham asset (1251669, Grade II) has been appropriately considered within the Environmental Statement framework.

Matter	Applicant Response
is beyond belief. This property means so much to the local community and those of us who have had the opportunity to live in the house. We have brought the house back to life it is a home and we consider ourselves conservators of the property for future generations. Over hundreds of years the property has stood cherished and preserved. And one would hope will still be standing in for many hundreds of years to come. Modern properties will not survive a fraction of the time our house has lasted and lived through. Such properties should be preserved and valued, this project as far as we know will be impacted and over looked by a series of pylons impacting the landscape and the environment. We cannot change the colour of our house due to heritage and planning regulations, we cannot even put solar panels on the barn adjacent to our house as the panels can be seen from the house and considered within the curtilage. We will be able to see the pylons in the field next to our home, our land will be directly impacted by the building of the pylons, we have requested details but told they can not advise. The value of our home will be significantly impacted to the extent of hundreds of thousands of pounds. It may be small change in respect to such a project but what is the value of heritage, it will be lost for the sake of a national project. What price can you place on nearly 500 years of history, in relative terms a short term profit for long term loss.	
Boxted Airfield Museum. Langham Village, Essex 2. What is the asset (church, house, ruin etc)? Former WW2 Airfield The Museum is on the original airfield site and is open from March to October. On special open days particularly when veterans families visit we have visiting aircraft. A grass airstrip is set up by a local flying club for aircraft to take off and land. This would be severely restricted if not impossible if there were pylons. Pylons would also spoil the views of this heritage site as at present it's open arable land with no structures to spoil the layout. The original	Concerning the potential impacts of the Project on aviation, please refer to **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]**. It identifies Boxted airfield as not operational. This followed engagement with former users who previously hosted aviation events at the site and advised that the runway was no longer useable. It is listed as disused on current aviation charts. Early engagement with the site owner did not reveal aviation concerns in relation to the Project. No impacts on the safety or operation of the airfield have therefore been assessed. See also page 246 of **8.8.1 Applicant's Comments on Written Representations [REP2-029]**, responding to REP1-209.

Matter	Applicant Response
roadways used by military vehicles and aircraft still exist, this allows us to carry out guided walks and vehicle tours of the site. The Pylons would obviously spoil this enjoyment and lose the Museum valuable revenue.	The heritage asset Boxted WWII Airfield, Langham (4063): The Applicant notes the concerns raised about visual impacts on the former World War II airfield heritage site and the potential effect on visitor experience and revenue. These issues have already been addressed in our earlier responses, including **8.8.1 Applicant's Comments on Written Representations [REP2-029]** and **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**, where we set out how the proposed pylons and associated infrastructure were assessed for landscape and setting effects and how mitigation within the approved framework would avoid or minimise harm to the site's historic character and viewing rights.
Pound Farm, Kelvedon 2. What is the asset (church, house, ruin etc)? House (grade 2 listed) Thet seem to disregard historic place and setting. The urbanisation of historical agricultural settings. The loss of trees and historical medieval hedged as part of setting also not appropriately weighted. 6. Has National Grid scoped out any heritage assets that you feel should be scoped in? Please list. No	The Applicant acknowledges this concern. The setting of listed buildings such as Pound Farm (1123812), has been assessed within **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**. The Applicant has assessed the significance of effect on the value of these assets within **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**. The Project has also assessed the level of harm on designated assets in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** where land that forms part of the setting of these assets falls within the Order Limits. Historical vegetation such as hedgerows has been considered and assessed as heritage assets by the Applicant. The **7.2 Outline Code of Construction Practice [Revision D]** provides standard mitigation to reduce change to the setting for designated assets, with commitments in Table 6.1 (including H06) to maintain landscape elements such as vegetation, hedgerows, walls and earthworks, and additional commitments GG07, GG17, GG26, AQ01, NV01, NV02 and NV05 to control works and minimise disturbance. Also, **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** includes measures to retain and reinstate landscape, ecological and historic landscape features, which inform the settings of heritage assets. Furthermore,

Matter	Applicant Response
	with regard to Pound Farm (1123812), **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** (pages 378–380) gives full detail of mitigation for this asset and its setting.
Kelvedon conservation area 2. What is the asset (church, house, ruin etc)? Kelvedon Village Conservative areas. Numerous listed properties and churched They underplay the relevance of historical setting. I would like to include Braintree district own assessment of the relevance of historical setting for kelvedon. The pylon scheme destroys that setting. It has a total disregard for schedule monuments also.	The Applicant has reviewed the assessment of Kelvedon Conservation Area in light of the respondent's comments. The Applicant is confident that the assessment of Kelvedon Conservation Area complies with the methodology outlined in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**. The assessment has been informed by site visits, aerial and street-view imagery, and in line with established heritage guidance, the Applicant has considered all relevant factors and has concluded that the setting does not extend to the Order Limits which means there would be no potential for effects resulting from the Project.
Hempnalls Hall, Cotton 2. What is the asset (church, house, ruin etc)? House They don't seem to give any weight to the importance of historic assets or historic landscapes 6. Has National Grid scoped out any heritage assets that you feel should be scoped in? Please list. Hempnalls Hall. St Andrews Church, Cotton	The Applicant notes the comment regarding Hempnalls Hall (1180451 – Grade II). **6.11 Environmental Statement Chapter 11- Historic Environment [AS 068]** provides an assessment of the Project's impact on the Grade II listed Hempnalls Hall (1180451). The assessment has considered how change in the setting of the asset would affect its value, in accordance with **6.19 Scoping Report [APP-288 – APP-296]**, **6.20 Scoping Opinion [APP-297]** and the methodology set out in **6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]**, which aligns with relevant heritage guidance. The position has already been addressed in **8.8.1 Applicant's Comments on Written Representations [REP2-029]** and **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**.
Broomfield, site of what was once believed to be a Roman villa 2. What is the asset (church, house, ruin etc)? House Underground archaeological remains - Romano-British temple	The Applicant has reviewed the assessment of the possible Romano-British villa site (6099) in light of the respondent's comments and confirms that this asset has been identified and assessed in accordance with the methodology set out **in 6.11 Environmental Statement Chapter 11 – Historic Environment**

Matter	Applicant Response
I could find no reference to this site at all, despite telling them about it in at least two consultations, and pointing out their flawed assessment in the consultation documents. Here is what I wrote in 2024: Specifically, the Preliminary Environmental Report Volume 3, Technical Appendices 3-4, Section 3.7.84-87 – pp 705 ff – contains inaccurate, out of date, incorrect information. This is what your document has to say: "3.7.86 The site of a Roman villa with hypocaust has been identified in a field to the east of Woodhall Farm (6099). The site of the building is indicated by a finds scatter recovered during fieldwalking comprising brick, flue tile, tile, plaster, a Colchester type brooch, 11 coins, bracelet fragments and pottery sherds including samian, and Castor and Oxford wares. This site is located at Dragonsfoot Field 40 m north of a draft Order Limits access road and approximately 250 m west of the settlement of Broomfield, just south of Patridge Green. The site is of evidential and historical value and is of medium value." You appear to have made your assessment from the Heritage Gateway entry from 1993 (Heritage Environment Record 1013). However, this is over 30 years old! As you can see, there is mention of some 11 coins. In fact, we know from metal detectorist Mike Cuddeford that over the years he has discovered over 550 coins and some 140 other metal objects dating from the entire Roman settlement period in Dragonsfoot, all fully documented. Furthermore, as mentioned earlier, the Preliminary Environmental Report quoted above takes no account of the more recent archaeological investigations reported on last year and the harm	**[AS-068]**. The Applicant highlights that the asset's value has been assigned following the framework described in the **6.19 Scoping Report [APP-288 to APP-296]**, **6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report [APP-209]**, and **6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068]** guidance, drawing on relevant Historic Environment Record information and professional judgement. We are confident in the approach taken, given the available evidence and the guidance applied. Also, the construction and operation impacts have been considered in **6.11.A2 Environmental Statement Appendix 11.2 – Historic Environment Assessment Tables [AS-070]**, with the assessment concluding a direct, temporary minor adverse significance during construction and a direct, permanent minor adverse significance during operation, which is considered proportionate and appropriate.

Matter	Applicant Response
that construction and access to pylons over such sites will cause in the short, medium and long terms. 6. Has National Grid scoped out any heritage assets that you feel should be scoped in? Please list. Yes: Dragonsfoot, Broomfield, site of Romano-British temple remains 7. Is there anything else you would like to add? I think I've said it all for now!	
Roman dig 2. What is the asset (church, house, ruin etc)? Roman excurvations	The Applicant currently does not have sufficient information to provide a substantive response to the comment. Once the outstanding information is provided, we will submit a formal reply in due course.
Ardleigh 2. What is the asset (church, house, ruin etc)? Agricultural landscape Ruination of land surrounding Ardleigh. 7. Is there anything else you would like to add? Ardleigh is being unnecessarily surrounded by Power Networks infrastructure	The Applicant acknowledges the concern about Ardleigh's agricultural landscape. However, Ardleigh and its setting have been assessed within the Environmental Statement, specifically **6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068]**, with setting descriptions detailed in **6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report [APP-209]**. Our responses to the same issues have already been provided in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** and **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**, where we set out how the setting of Ardleigh has been considered, the mitigation framework (including embedded mitigation and design alternatives, standard and additional mitigations), and the process for ongoing stakeholder engagement to manage impacts in a proportionate manner.
Aldeburgh and Suffolk coast. 2. What is the asset (church, house, ruin etc)? Whole environment and nature of the town.	The Applicant has complied, and continues to comply, with the relevant legislation, policy and guidance in promoting its application which, as the documents being examined demonstrate, has

Matter	Applicant Response
This whole disgraceful endeavour is a catastrophic crime against nature, community, environment, flora and fauna, mental and physical health, and an AREA OF NATURAL BEAUTY! The perpetrators are completely lacking in intelligence or understanding. The destruction can never be repaired. Destroying thousands of trees and hedgerows because you got the map the wrong way up? Because you can't be bothered to preserve what you can? Slaughtering 200 deer because you have destroyed their habitat? Because you are CRIMINAL FOOLS!!! 6. Has National Grid scoped out any heritage assets that you feel should be scoped in? Please list. They have scoped nothing except what suits their version of 'truth' ie their lies. 7. Is there anything else you would like to add? Yes but it isn't printable.	included in depth consideration of routing, alternatives, environmental impacts and appropriate mitigation measures.
Church of St Remigus Roydon 2. What is the asset (church, house, ruin etc)? Church they say it ha a low adverse impact but my understanding is the pylon route goes directly across the field next to the church and will be a permanent scar on that view and environment - they say impact will be temporary 7. Is there anything else you would like to add? thnak you for all your work on this	St Regimus Church, Roydon (1050237 – Grade I) The raised issue regarding St Regimus Church, Roydon (Grade I) has been addressed recently. Please refer to the Applicant's Deadline 2 response to the Written Representation from Historic England, found in **8.8.1 Applicant's Comments on Written Representations [REP2-029]** (pages 68 to 70). Supporting justification can also be found in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**, **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** and **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**.
St Remigius Church, Roydon, Norfolk 2. What is the asset (church, house, ruin etc)? Church	The issue raised regarding St Regimus Church, Roydon (Grade I) has been addressed recently. Please refer to the Applicant's Deadline 2 response to the Written Representation from Historic England, found in **8.8.1 Applicant's Comments on Written Representations [REP2-029]** (pages 68 to 70). Supporting

Matter	Applicant Response
National Grid contends that the impact of pylons on the Grade I listed St Remigius Church of 50m pylons will be negligible or minor. Yet the church is on the north side of the Waveney Valley with extensive views across this important landscape - the pylons will be to the west, south west and south of the church in clear view. Anyone viewing the church from the bottom of the valley, on footpaths through the valley to the south of the church and to the south-east will clearly see that the setting and views of the church would be severely harmed by the pylons and associated cables. It is utterly disingenuous of the Grid to claim the impact would be minor, unless their 'experts' were looking at the church from the entrance to the north.	justification can also be found in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**, **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**, **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** and **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2** [submitted at D4].
feeringbury manor, feering 2. What is the asset (church, house, ruin etc)? House, roman settlement,site of plgrimage route canterbury to wlsingham, site of roman settlement	Feeringbury Manor (1306710 – Grade II*). Even where comments are not framed as a direct question, the Applicant confirms that questions about this asset have been addressed in our submissions. Please refer to the Applicant's Deadline 2 response to the Written Representations from Historic England, found in **8.8.1 Applicant's Comments on Written Representations [REP2-029]** (page 78), for the detailed justification, assessment approach and any mitigation considerations.
Church of St Remigius, Roydon (1050237) 2. What is the asset (church, house, ruin etc)? Church In my opinion, National Grid has understated the harm to the church of St Remigius. As a Grade 1 listed building, its significance is closely tied to its real setting and to its visual and historic relationship with the surrounding landscape at the edge of Roydon. The proposed pylons, haul road, suds adsins, crossing works and associated construction activity would introduce large-scale infrastructure, movements and noise into this setting. Although described as temporary, these effects would be substantial and	St Regimus Church, Roydon (1050237 – Grade I) The issue raised regarding St Regimus Church, Roydon (Grade I) has been addressed recently. Please refer to the Applicant's Deadline 2 response to the Written Representation from Historic England, found in **8.8.1 Applicant's Comments on Written Representations [REP2-029]** (pages 68 to 70). Supporting justification can also be found in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**, **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** and **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**.

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would disrupt the tranquillity and character of the churches surrounding them during construction. In addition, the permanent presence of 50 m pylons in views to and from the church would cause a lasting change to its setting. Given the high value of the asset, I do not agree that the magnitude of impact should be considered only low adverse. In my view it is at least medium adverse, and the resulting level of harm should be greater than stated. 6. Has National Grid scoped out any heritage assets that you feel should be scoped in? Please list. Coherent as a coherent historic land and group of listed buildings, the collective setting, the Waveney Valley surrounding open fields and key views along Snow Street into and out of the village 7. Is there anything else you would like to add? The key concern is that the scheme does not simply pass by Roydon. It approaches across open countryside, runs close to Snow Street, and it's a listed building, and then continues around the village edge into the Waveney Valley. This creates a cumulative and enclosing effect on the historic setting. The National Grid assessment appears overly standardised and does not fully reflect the combined impact of proximity, scale, construction activity, and permanent infrastructure on the sensitive historic environment.	Further explanation of the approach to assessment of groups of heritage assets is provided in **8.17 Response to Rule 17 Letter - Historic Environment** (submitted at Deadline 4). The conclusion of the assessment was not given greater weight because of the group dynamic as the Applicant, in line with legislation, policy and guidance, considers cumulative impacts to be derived from separate developments. The guidance provided by Historic England[30] does not define cumulative effects in terms of number of assets affected, but in terms of effects resulting from multiple developments affecting the same asset. The same approach is also set out in the Historic Environment Planning Practice Guidance[31].
The Gables, Roydon (1373310) 2. What is the asset (church, house, ruin etc)? House While National Grid identifies a	The Applicant has reviewed the assessment of the Gables listed building in light of the respondent's comments and acknowledges that the Project could be occasionally visible from the asset. The Applicant also confirms within **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** and **6.11.A7 Environmental Statement Appendix 11.7 -**

[30] Historic England (2017) *The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)*

[31] Ministry of Housing, Communities and Local Government (2019) *Guidance: Historic Environment*

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Moderate adverse effect, I consider that the assessment still understates the harm. The works would be approximately 100m from the asset and clearly visible. At the proximity pylons, haul roads, and construction activity would introduce a significant industrial presence into what is currently a rural historic setting. The Gables should be considered as part of the wider Roydon and Snow Street historic environment. The assessment appears to treat it as an isolated asset, whereas its significance is partly derived from its relationship to nearby listed buildings, open land and village edge. When considered cumulatively with other nearby infrastructure and impacts, I believe the magnitude of effect is at the upper end of medium and potentially higher than what the National Grid has suggested. 6. Has National Grid scoped out any heritage assets that you feel should be scoped in? Please list. Snow Streetasa coherent historic lane, and group of listed building the collective setting of Roydon village the relationship between village surrounding open fields and waveney valley. 7. Is there anything else you would like to add? A key concern is that the scheme does not simply pass by Roydon. It approaches across an open field, runs close to Snow Street, is a listed building, and then continues around the village, with an enclosing effect on the historic settings. National Grid's assessment appears too standardised and does not fully reflect the combined impact of proximity scale, co-instruction activity, and permanent infrastructure on the sensitive historic environment.	**Assessment of Harm to Designated Heritage Assets [APP-215]** that during the construction phase, there is likely to be a temporary moderate adverse significance of effect on the asset, and that the asset would experience Mid Less Than Substantial Harm. However, these impacts would be temporary, and the construction related elements of the Project would be reinstated following completion of construction. Therefore, it is not considered necessary to microsite all temporary elements of the works. The Applicant also notes that for the Snow Street and wider Roydon asset cluster, a group value was not applied to the Gables house or the surrounding assets in the immediate area. Further explanation of the approach to assessment of groups of heritage assets is provided in **8.17 Response to Rule 17 Letter - Historic Environment** (submitted at Deadline 4). The setting description in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** does consider the contribution that the various designated and non-designated heritage assets in this area make to each other significance through their contribution to settings, and this informed assessment in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**. Crucially the Project would not affect the inter-relationships between the heritage assets within Snow Street and Roydon as it would pass around them. The conclusion of the assessment was not, however, given greater weight because of the group dynamic as the Applicant, in line with legislation, policy and guidance, considers cumulative impacts to be derived from separate developments. The guidance provided by Historic England[32] does not define cumulative effects in terms of number of assets affected, but in terms of effects resulting from

[32] Historic England (2017) *The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)*

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	multiple developments affecting the same asset. The same approach is also set out in the Historic Environment Planning Practice Guidance[33].
Limetree Farrhouse, Snow Street, Roydon (2373273) 2. What is the asset (church, house, ruin etc)? House I do not agree with National Grid's assessment, as it does not properly reflect the importance of the farmhouse agricultural setting. As a historic farmhouse, its significance is closely linked to its relationship with the surrounding farmland and open countryside. 6. Has National Grid scoped out any heritage assets that you feel should be scoped in? Please list. The proposed works, including pylons and haul road at approximately 100 m distance, would industrialise that setting and disrupt the historic relationship between the building and the land it relates to. This is more than a general change to a wider rural setting; it is a direct impact on the defining context of the asset. There would also be a loss of tranquillity, increased movement and construction dust, followed by a permanent change in outlook. In my view, this represents a greater level of harm than the national grid had identified.? Snow Street as a coherent historic lane and group of listed building. The collective setting of Roydon village. The relationship between the village surrounding fields and the Waveney Valley. 7. Is there anything else you would like to add? A key concern is that the scheme does not simply pass a distance from Roydon; it approaches across open fields, runs close to Sniw Street, passes listed buildings, and then continues around the	Limetree Farmhouse (1373273) The Applicant has reviewed the assessment of the listed Limetree Farmhouse in light of the respondent's comments. The Applicant acknowledged that the setting of this asset is informed by the agricultural landscape to the west and north with which the asset and associated outbuildings have historical and functional relationships as noted within **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**. Following the methodology outlined within **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**, the Applicant has also assessed the impact of the Project on this asset during the construction phase within **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** and concluded that during the construction phase, there is likely to be a temporary moderate adverse significance of effect on the asset, and that the asset would experience Mid Less Than Substantial Harm. However, these impacts would be temporary, and the construction related elements of the Project would be reinstated following completion of construction. Therefore, it is not considered necessary to microsite all temporary elements of the works. The Applicant also notes that for the Snow Street and Roydon village asset cluster, the group value was not applied to determine the value of Limetree Farmhouse or the surrounding assets in the immediate assessment. While the overarching approach in **6.11**

[33] Ministry of Housing, Communities and Local Government (2019) *Guidance: Historic Environment*

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village edge into the Waveney Valley. This creates a cumulative and enclosing effect on the historic setting. The national grid assessment appears too standardised and does not fully reflect the combined impact of proximity-scale construction and permanent infrastructure on the sensitive historic environment.	**Environmental Statement Chapter 11 – Historic Environment [AS-068]** recognises that group value can be relevant in reflecting cumulative importance, we acknowledge that, in this instance, the group value has not been used to derive the value of the asset itself. The assigned value for these assets remains informed by the methodology in **6.19 Scoping Report [APP-288 to APP-296]**, **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**, and the guidance within **6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068]**, applying professional judgement as appropriate. Therefore, the Applicant is confident in its assessment of this asset's value. Moreover, the Applicant, in line with legislation, policy and guidance, considers cumulative impacts to be derived from separate developments. The guidance provided by Historic England does not define cumulative effects in terms of number of assets affected, but in terms of effects resulting from multiple developments affecting the same asset. The same approach is also set out in the Historic Environment Planning Practice Guidance[34].
The Hermitage, snow Street, Roydon (1050271) 2. What is the asset (church, house, ruin etc)? House I do not agree with the National Grid assessment because it significantly understates both the scale and nature of the impact on the Roydon heritage assets. The route approaches Roydon across open countryside, runs close to Snow Street, a listed building, and then passes directly behind Barnards Green before continuing into the Eaveney Valley. At this point, the scheme effectively wraps around the village edge. This	The Applicant has assessed the heritage asset The Hermitage (1050271) in line with the methodology set out in **6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068]**. The Applicant notes that for the Snow Street and Baynards Lane/Baynards Green asset cluster, the group value was not applied to determine the value of the Hermitage asset or the surrounding assets in the immediate assessment. While the overarching approach in **6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068]** recognises that group value can be relevant in reflecting cumulative importance, we acknowledge that, in this instance, the group value has not been

[34] Ministry of Housing, Communities and Local Government (2019) *Guidance: Historic Environment*

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means the heritage assets are not affected in a single direction, but from multiple angles, creating a cumulative, enclosing effect. At Barnard Green, the construction phase would introduce haul roads, heavy vehicle movements, noise, and associated works into a quite historic environment, given the permanent presence of 50 m pylons. Although described as temporary, this level of activity would have a substantial impact on tranquillity and charter. Furthermore, the Snow Street and Baynards Lane/Baynards Green area contains a higher concentration of listed buildings, forming a connected historic settlement edge. These assets derive significant value not only individually but also through their relationships with each other and with the surrounding landscape. National Grid's assessment does not adequately reflect this group value or the scheme's cumulative impact across multiple assets. For these resins, I believe the impact has been underestimated, and the overall level of harm is greater than the national grid has concluded. 6. Has National Grid scoped out any heritage assets that you feel should be scoped in? Please list. Yes, I believe National Grid has significantly under-represented both the number and distribution of heritage assets in Snow Street, Baynards Lane, and Baynards Green, including Roydon Hall and other listed properties. This forms a continuous and coherent historic settlement edge rather than a series of separate locations. In several cases, these assets are physically and historically connected; formal listing descriptions refer to Baynards Lane in relation to Snow Street properties, demonstrating that this is a single historic environment. However, the current assessment	used to derive the value of the asset itself. The assigned value for these assets remains informed by the methodology in **6.19 Scoping Report [APP-288 to APP-296]**, **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**, and the guidance within **6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068]**, applying professional judgement as appropriate. The Applicant also notes that in line with legislation, policy and guidance, it considers cumulative impacts to be derived from separate developments. The guidance provided by Historic England[35] does not define cumulative effects in terms of number of assets affected, but in terms of effects resulting from multiple developments affecting the same asset. The same approach is also set out in the Historic Environment Planning Practice Guidance[36]. Moreover, following the methodology outlined within **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**, the Applicant has also assessed the impact of the Project on this asset during the construction phase within **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** and concluded that during the construction phase, there is likely to be a temporary moderate adverse significance of effect on the asset, and that the asset would experience Mid Less Than Substantial Harm. However, these impacts would be temporary, and the construction related elements of the Project would be reinstated following completion of construction. Therefore, it is not considered necessary to microsite all temporary elements of the works.

[35] Historic England (2017) *The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)*

[36] Ministry of Housing, Communities and Local Government (2019) *Guidance: Historic Environment*

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appears to separate these areas by street names and assess only a limited number of buildings individually. This approach fragments what is, in reality, a dense and sensitive heritage cluster to properly assess the cumulative impact of the scheme. In particular, at Baynards Green, the proposed route runs directly behind the village, placing pylons and associated infrastructure in very close proximity to listed buildings. This is also the point at which the route wraps around Roydon, creating an enclosing effect on the red historic settlement. In my opinion, Snow Street and Baynards Green/Baynards Lane should be assessed as a connected heritage group or as a historic settlement character area. The number of listed buildings affected by the route, and the cumulative and enclosing nature of the scheme, significantly increases the Overall level of harm beyond what had been identified. 7. Is there anything else you would like to add? A key issue is the number of listed buildings in Royfon and the extent to which they are all affected by the scheme. Snow Street and Baynards Green / Lane together form a historic cluster, not isolated assets. The pylons do not simply pass nearby but effectively wrap around a village, meaning they will be visible from multiple directions and across much of Roydon. This will fundamentally change the village's character and feel. In my view, describing this level as “medium” is not accurate. The scale, proximity, and cumulative nature of the scheme mean that the harm to the historic environment will be far greater and long-lasting, affecting a village whose character has developed over centuries.	

Thatch End, / The Haven, Snow Street, Roydon (1154298)'

2. What is the asset (church, house, ruin etc)?

House

I do not agree with the National Grid assessment because it significantly understates both the scale and nature of the impact on the Roydon heritage assets.

The route approaches Roydon across open countryside, runs close to Snow Street, a listed building, and then passes directly behind Barnards Green before continuing into the Eaveney Valley. At this point, the scheme effectively wraps around the village edge. This means the heritage assets are not affected in a single direction, but from multiple angles, creating a cumulative, enclosing effect.

At Barnard Green, the construction phase would introduce haul roads, heavy vehicle movements, noise, and associated works into a quite historic environment, given the permanent presence of 50 m pylons. Although described as temporary, this level of activity would have a substantial impact on tranquillity and charter.

Furthermore, the Snow Street and Baynards Lane/Baynards Green area contains a higher concentration of listed buildings, forming a connected historic settlement edge. These assets derive significant value not only individually but also through their relationships with each other and with the surrounding landscape. National Grid's assessment does not adequately reflect this group value or the scheme's cumulative impact across multiple assets.

For these reasons I believe the impact has been underestimated, and the overall level of harm is greater than the national grid has concluded.

6. Has National Grid scoped out any heritage assets that you feel should be scoped in? Please list.

Yes, I believe National Grid has significantly under-represented both the number and distribution of heritage assets in Snow Street,

The Applicant notes that for the Snow Street and Baynards Lane/Baynards Green asset cluster, the group value was not applied to determine the value of Thatch End The Haven asset or the surrounding assets in the immediate assessment. While the overarching approach in **6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068]** recognises that group value can be relevant in reflecting cumulative importance, we acknowledge that, in this instance, the group value has not been used to derive the value of the asset itself. The assigned value for these assets remains informed by the methodology in **6.19 Scoping Report [APP-288 to APP-296]**, **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**, and the guidance within **6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068]**, applying professional judgement as appropriate. The Applicant also notes that in line with legislation, policy and guidance, it considers cumulative impacts to be derived from separate developments. The guidance provided by Historic England[37] does not define cumulative effects in terms of number of assets affected, but in terms of effects resulting from multiple developments affecting the same asset. The same approach is also set out in the Historic Environment Planning Practice Guidance[38].

The Applicant has reviewed the assessment of Thatch End The Haven in light of the respondent's comments and agrees that there might be a temporary moderate adverse significance of effect and a Mid Less than Substantial Harm on the asset during the construction phase, as concluded in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables** [**AS-070]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets** [**APP-215]**. However, these impacts would be temporary, and the construction related elements of the Project would be reinstated following completion of construction. It is then not considered necessary to microsite all temporary elements of the works. As for the operation phase, the Applicant notes that the line of pylons in the distance would be seen from the asset only to

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Baynards Lane, and Baynards Green, including Roydon Hall and other listed properties. This forms a continuous and coherent historic settlement edge rather than a series of separate locations. In several cases, these assets are physically and historically connected; formal listing descriptions refer to Baynards Lane in relation to Snow Street properties, demonstrating that this is a single historic environment. However, the current assessment appears to separate these areas by street names and assess only a limited number of buildings individually. This approach fragments what is, in reality, a dense and sensitive heritage cluster to properly assess the cumulative impact of the scheme. In particular, at Baynards Green, the proposed route runs directly behind the village, placing pylons and associated infrastructure in very close proximity to listed buildings. This is also the point at which the route wraps around Roydon, creating an enclosing effect on the red historic settlement. In my opinion, Snow Street and Baynards Green/Baynards Lane should be assessed as a connected heritage group or as a historic settlement character area. The number of listed buildings affected by the route, and the cumulative and enclosing nature of the scheme, significantly increases the Overall level of harm beyond what had been identified 7. Is there anything else you would like to add? Within the area of Snow Street / Baynards Green / Lane Grade 1 listed x 1	the west of the asset. However, the view to the closest pylon, which is located c.200 m, will be screened by buildings and mature vegetation, and therefore the Applicant disagrees with the respondent's assessment that more than lower less than substantial harm should be applied. The Applicant is therefore satisfied that the conclusions reached in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables** [**AS-070]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets** [**APP-215]** of permanent minor adverse significance of effect and Lower Less Than Substantial Harm are appropriate.

[37] Historic England (2017) *The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)*

[38] Ministry of Housing, Communities and Local Government (2019) *Guidance: Historic Environment*

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Grade II Listed x 11 Barnard Green /Lane Grade II Listed x 14 Total cluster: 16. These are all connected to the edge of Roydon village, and the pylons route runs close to many of these assets. The proximity and height of the pylons in relation to homes and listed buildings. At a distance of 80 to 100 m, high pylons will not fit into the wider landscape but will dominate the immediate setting of these properties and break the existing skyline. National Grid's own assessment acknowledges that meaningful visual mitigation is limited, as screening of this scale would itself harm the setting. This indicates that the impact cannot be effectively reduced. In my view, this reinforces that the harm is significant and unavoidable rather than supporting a lower assessment impact.	
Southwoods House, Writtle 2. What is the asset (church, house, ruin etc)? house and buildings NG have described Southwoods as medium and the impact as low. No idea how they think that a building dating back around 600 years with no foundations and a timber frame will not be majorly impacted by the building of pylons under 100 metres away. Nor the visual impact on on a beautiful old house and buildings which is apparently low significance therefore described as not significant. No one will want to buy the property in the future. Despite being able to see and hear the pylons from the property NG consider this low adverse and not significant. No operation phase mitigation is advised despite the fragile nature of the construction of the buildings. There are also walking paths in ancient woodlands and fields in this area where the pylons are to be sited	The Applicant notes that this raised issue about Southwoods, Writtle ('Southwoods' (1237174), 'Granary and Cart Lodge at Southwoods Farm' (1237420) and 'Barn at Southwoods Farm' (1237421)), has been addressed within **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** – p. 316; 381; 383. Please also refer to **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**.

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6. Has National Grid scoped out any heritage assets that you feel should be scoped in? Please list. It has put the 5 listed homes, some with listed cart sheds etc under one heading - Southwoods. There are 5 different owners of these spread out historic properties. The topography does not help us either with the pylons planned on a higher level than our properties.	
Flordon Hall, Dower House and Norfolk Long Barn: Flordon 2. What is the asset (church, house, ruin etc)? Manorial Hall and two barns Applicant fails to assess the assets correctly. See para 7 6. Has National Grid scoped out any heritage assets that you feel should be scoped in? Please list. Yes, see the report attached at 7. 7. Is there anything else you would like to add? Entry Name: Flordon Hall 15th c. Grade: II* Source: Historic England Source ID: 1050698 English Heritage Legacy ID: 226593 Entry Name: 2 storey Dower House, 16th c., called the Piggery by NG in the curtilage of Flordon Hall Grade: II Source: Historic England Source ID: 1172231 English Heritage Legacy ID: 226594 Entry Name: Timber Framed 16th c. Norfolk Long Barn also in the curtilage of Flordon Hall Grade: II Source: Historic England Source ID: 1373055	Ecology Response: The Applicant recognises the value of Norton's Wood as a County Wildlife Site (CWS), but it is not identified as an ancient woodland site on the Ancient Woodland Inventory. Impacts to the CWS were assessed in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. The impact assessment identifies that the CWS is outside the Order Limits and will be avoided by the Project, although a temporary construction haul road would be constructed adjacent to the woodland. Mitigation measures linked to the Norton's Wood CWS have been presented within **7.4 Outline Landscape and Ecological Management Plan [REP3-030].** Within this management plan it identifies the potential for accidental encroachment and that the construction area would be fenced thus avoiding any direct impact to this habitat. **7.4 Outline Landscape and Ecological Management Plan Appendix A - Arboricultural Impacts Plan [Revision B]** identifies the trees associated with the woodland that are closest to the Order Limits as a group of trees 'G19', it shows that the haul road will be outside the root protection zone of these trees and that these trees would be unaffected by the Project. As identified in **7.4 Outline Landscape and Ecological Management Plan Appendix A - Arboricultural Impacts Plan [Revision B]** a small area of the trees that are present along the tributary of the Tas, next to RG24, would need to be removed to facilitate electrical clearances for the overhead line. These works would affect tall trees and shrubs only, the bankside and aquatic flora and fauna would not be affected. It is also proposed to

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English Heritage Legacy ID: 226595 Flordon Hall in a significant Grade II* listed property. It has medieval origins, with later Tudor alterations. A significant amount of the original fabric survives and it clearly shows the evolution from a medieval hall house into a later gentrified residence. The building reflects centuries of continuous occupation and status. It is tied to the development of a rural estate and local social hierarchy. The Hall's historical significance is further highlighted by its association with the Buttevelyan family, who owned the land in AD1103 and the Kemps, who owned a large manorial estate by the end of the 16th century. The Hall has been a central part of the Flordon village's identity and continues to be a symbol of the area's heritage. It is intrinsically linked to the parish church, St Michael and All Angels, Flordon, also a grade 2* building. Many occupants of Flordon hall are listed as either Patrons or clergymen of the church dating back to the 17th c. The associated building/barn* are Grade II listed and are excellent representative examples of traditional Norfolk rural buildings. *One building has been identified as the 'piggery' by the applicant. It is in fact a substantial two store Dower House (very clear if you actually look at the building), with a single story cob barn attached, which has a date stamp of AD1134. Whilst the Applicant acknowledges that the Hall and Barns are located close to each other, they clearly just see them as three listed buildings. It should be noted that the site's importance is greater than the sum of its parts. It's not just three buildings; it's a complete historic environment. The Hall shows how people lived, the barns show how they worked, and the landscape ties it all together. Together they form a well-preserved, legible historic estate, which is why the whole site and landscape is such a significant heritage asset. The proposed pylons on our land (RG19-RG24) would pass from	underground a 11 kV cable beneath this watercourse. The amount of bankside vegetation that would be affected by this undergrounding work would be minimal. Standard mitigation measures delivered through **7.2 Outline Code of Construction Practice [Revision D]** would ensure that water quality is protected. As identified in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**, this watercourse is linked to Flordon Common Site of Special Scientific Interest (SSSI) which is also identified as a component of Norfolk Valley Fens Special Area of Conservation (SAC). The value of the SSSI and SAC to biodiversity and ecology is acknowledged by the Applicant, and it is this area that is identified as an Area of Particular Importance for Biodiversity in the LNRS. Through careful design the Project has sought to avoid direct and indirect effects on the habitats and species that these statutory designated sites support. The Applicant has completed a Habitats Regulations Assessment: **5.3 Habitats Regulations Assessment Report [APP-082]** that has been accepted by Natural England and concludes no significant effects on the SAC, its qualifying features (i.e. the habitats and species that it supports) or its conservation objectives. **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** identifies that the Project is hydrologically connected to Flordon Common SSSI and concludes that during construction, with the mitigation measures in place that protect water quality, the Project would have no significant residual effect on the SSSI, its habitats and species. Heritage response: The Applicant notes than some of the raised issues have been addressed in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings [REP2-028]**. The Applicant has assessed the assets following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** – Annex C. This

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North to South West of the complex, the closet of which (RG21) would be some 200 m away. The frontage of Flordon Hall faces East, so the pylons will be seen from the rear but at that distance they will have a profound impact and dominate all views west over the land. No appropriate viewpoint image has been produced to make an assessment of this effect. However, a viewpoint image was taken from the Long Lane, to the south east of the Hall so its focus is taken from an oblique angle. It does however, give some indication of the likely appearance of the proposed development and how it will change an otherwise agricultural landscape. There are hedgerows and trees between the listed buildings and the fields containing the proposed development however, the pylons will be clearly visible from the immediate setting of the Hall, not least because the land height increases as you look towards the pylon locations. In terms of impact, it is noted that significant effects are identified up to a distance of approximately 1.5 km for landscape receptors and up to a distance of approximately 2 km for visual receptors. However, in terms of significance, the properties at No 70-73 Flordon Rd and the property, 'High Hopes' will have pylons RG21 and RG22 about 100m from their kitchen window. These are tenanted properties belonging to Flordon Hall and let at affordable rates for local people. As they are in the wider curtilage of the Hall it is understood that they should be afforded similar protected status as the Hall and Barns. The effect on these properties and the property 'Gable End', will be devastating. The applicant's conclusions about harmful impact seem to be based on views from the listed buildings rather than views of them in their landscape setting. The Applicant considers that the assessment of permanent moderate adverse significance of effect (significant) (**6.11.A2 Environmental Statement Appendix 11.2 –**	includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)[39]. In the **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** – paragraph 3.2.548 the Applicant specifies the importance of the shared setting of these assets and its contribution to their value. The use of the name Piggery for asset 1172231, identified by the Applicant, is derived from the official listing name from Historic England and its former possible use as a dower house is acknowledged in the **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** – paragraph 3.2.547. As described in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** the intervening landscape between the asset and the Project includes buildings, copses, and mature tree-lined hedgerows that would interrupt and break up the views from the asset towards the Project. The principal elevation of the asset faces east, and views eastwards would not include or be impacted by the Project. Nor would the Project impact the asset's relationship and intervisibility with the Farmstead and its two Grade II listed elements (Piggery 60 Yards South of Flordon Hall (1172231) and Barn to Flordon Hall (1373055)). The asset can be viewed from Long Lane c. 480 m to the south-east, and this view would potentially include the top of pylons RG21 and RG22 cresting above mature tree-lined hedgerows and copses to the north-west of the asset. The matter submitted suggests the photo provided in Plate 22 – Annex D of **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** is not appropriate for assessing the impact of the Project. It should be noted that setting of heritage assets was not solely informed by walkover survey undertaken in Annex D, but also aerial and street-

[39] Historic England (2017) *The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)*

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Historic Environment Assessment Tables [AS-070]) and Mid Less Than Substantial Harm (**6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP- 215**]) to this listed building is appropriate and reflects the harm to the value of this asset. In this process they conclude the following: Flordon Hall: It is concluded that the asset would experience Mid Less Than Substantial Harm. Dower House or Piggery: It is concluded that the asset would experience Lower Less Than Substantial Harm. Long Barn: It is concluded that the asset would experience Lower Less Than Substantial Harm. South Norfolk District Council own experts disagree with these assessments and have written to the ExA to that effect. In relation to Flordon Hall state "It is considered that Flordon Hall should be assessed as incurring a higher level of less than substantial harm than National Grid indicates". They conclude that the assessment should state; "Flordon Hall: Moderate adverse significance of effect (significant); High less than substantial harm. The Applicant carried out a walk over exercise, taking photos of what they considered important within the landscape of the Order limits. One of the photos, noted as Plate 22, "shows a Farmyard with the Barn to Flordon Hall and Piggery 60 yards south of Flordon Hall, looking east". They also note the following: "Known Heritage Assets 2.1.23 The farmyard, where are located the Grade II barn to Flordon Hall (1050698) and the Grade II Piggery 60 yards south of Flordon Hall (1172231), is visible from the Order Limits (Plate 22). As for the Flordon Hall (1050698), it is	view imagery, and viewpoint assessment. This includes historical Viewpoint HE1 to the east of Flordon Hall, giving a view to the front of the hall with the Project behind – **7.12 Visualisations - Part 8 of 9 [APP-350]**. The Applicant is, therefore, confident in its assessment that the Project would cause a low adverse magnitude of impact prior to mitigation resulting in a direct, permanent moderate adverse significance of effect (significant). The Applicant is also confident in its conclusion that the asset would experience Mid Less Than Substantial Harm. In its written representation **[REP1-191]**, Historic England, statutory heritage advisor to the Secretary of State, agrees with the Applicant's assessment of Flordon Hall and so the Applicant is satisfied with the assessment. With regard to the piggery and the barn, whilst many of the elements of the setting of the hall are shared with these assets, the Applicant considers their settings to be more integral to the Flordon Hall complex with the wider agricultural landscape not as prominent an element of their settings as it is for the hall. The Applicant acknowledges the comment regarding the spoil shown in Plate 28, but does not agree with assessment of significance of the adjacent hole.

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not visible due to a tree line to its west". The photo appears to be an attempt to hoodwink the planning process by reducing the impact that pylons will have on this historical site. This action appears common place throughout the planning application. What the photographer failed, or possibly, intended not to notice, was that if they had taken the photo a few yards to their right, you would clearly see Flordon Hall and the two listed barns in the picture. So, the obverse photo would clearly show just how significant and dominating the pylon at that location will be from the Hall and barns. I add the following paragraph as it demonstrates the significant way the Applicant has chosen to twist the way a setting is described and the ignorance that has been used to describe certain settings. Plate 28 A topsoil pile along Wymondham Road, looking north-east. 2.1.30 2.1.31 "A top-soil pile was witnessed during the walkover survey. The pile looked to be the soil from a hole which had been intentionally dug in the area next to the field entrance along Wymondham Road (Plate 28). The area is principally agricultural in use and is subject to modern farming practices including large drainage ditches". What this actually shows is a pile of spoil left after the sugar beet have been harvested. The beet is stacked on the edge of the field next to the road, before being loaded for onward transportation and processing. This practice has been carried out for generations and is how we get most of the white sugar used in the UK. The hole they note is extremely significant. It is understood that this is one of the sites of a clay pit which was dug out to provide the clay to form the handmade bricks for Flordon Hall and the Dower House.	

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Flordon Hall and the area around the Hall and farm create a setting that has inspired many artists. The world renown artist, George Edward Mackley MBE (born 1900 in Huntingdon, died 1983 in Tonbridge, Kent) was an English wood engraving artist. He created many pictures in and around Flordon Hall. One of his pictures and widely considered to be Mackley's finest wood engraving, was made at the Hall and entitled, "Threshing at Flordon Hall". This subject was chosen as the front cover illustration for the retrospective show on Geroge Mackley's wood engravings staged by Blond Fine Art in London in 1995. It not only depicts threshing but also the rural tranquillity around the Hall. The natural environment around Flordon Hall is typical of rural south Norfolk but with some particularly interesting ecological features because of its position in the River Tas valley. The surrounding land is mostly arable farmland and pasture. Fields are divided by mature thick hedgerows and tree lines, which are important wildlife corridors. Small copse and spinney as well an ancient woodland (Nortons Wood 52.542956, 1.231616), break up the open landscape. These features create important wildlife corridors, allowing species to move between habitats in an otherwise open farming landscape. The applicant states that they have an Exclusion zones Commitment in respect to ancient woodland which can be found at Reference B17 in Table 6.1 of the outline CoCP **[APP-300]** and refers to the provision of a 15m minimum exclusion zone from the edge of ancient woodland. This has been totally disregarded in respect of Nortons Wood mentioned above, where there is no exclusion zone. For many years we have been working with Norfolk Farming and Wildlife Advisory Group (FWAG) who support farmers in South Norfolk to manage land for wildlife enhancement rather than operating specific, named public nature reserves. They have provided us with advice on biodiversity and ecological improvement	

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across the farm. As a result we have created a substantial County Wildlife Site which has been recognised by South Norfolk County Council in the Norfolk Local Nature Recovery Strategy (LNRS) and the Norfolk Biodiversity Information Service (NBIS) which is a Local Environmental Record Centre holding information on species, geodiversity, habitats and protected sites for the whole of the county of Norfolk . This area, which is adjacent to the location of pylon RG24 has been identified as an Area of Particular Importance for Biodiversity (APIB). The area is recognised as having particular importance for biodiversity through local, national or international designations. Using the corridor principle for wildlife, the site is linked via permanent grass land and a chalk stream which is a tributary of the river Tass, to Flordon Common with its SSSI and the SAC. Flordon Hall is a short distance from Flordon Common, the key ecological feature in the area. It contains a Site of Special Scientific Interest (SSSI) which is of national importance and Special Area of Conservation (SAC). The SAC designation places it among the most important conservation sites in Europe; it is a exceptional and fragile habitat. The SAC is home to rare species, including the Desmoulin's whorl snail. Other notable wildlife includes Water voles, Barn owls and Barbastelles Bats. Both areas butt up to Flordon Hall land and both areas are endangered by pylon RG23 and RG24. With the SAC included, the landscape around Flordon Hall is not just farmland. The presence of the SAC means the area is part of a carefully protected ecological network, where water, soil, and land use are tightly linked. The area is peaceful farmland sitting next to a rare, spring-fed wetland of European importance, where tiny changes in the environment can have big ecological consequences. So in conclusion, I consider scale of the intrusion by introducing 50m high pylons on 50m Sq. concrete rafts would result in a high	

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level of less than substantial harm to the significance of the grade II* listed building and associated barns. Whist the Applicant has made a subjective assessment as to the harm to these historic buildings, they have only provided sufficient information and evidence to support that subjective assessment. It is therefore appropriate to conclude that they have misconstrued the facts to support their stated aim and whether by intent or ignorance they have misled others to become complicit in that aim.	
St Remigius Church, Roydon, Grade 1 (105023)). The asset is in a valued landscape area of the Waveny Valley. The damage to the Church is described by NG as temporary Low Adverse7). This important, beautiful and high building will be severely impacted by the proposed pylons route. There will be considerable noise and movement 350m from the asset through pylos and haul road. The value of this asset is high but NG it only needs standard mitigation and that the impact of pylons and the visibility of the church.	St Regimus Church, Roydon (1050237-Grade I) The raised issue regarding St Regimus Church, Roydon (Grade I) has been addressed recently. Please refer to the Applicant's Deadline 2 response to the Written Representation from Historic England, found in **8.8.1 Applicant's Comments on Written Representations [REP2-029]** (pages 68 to 70). Supporting justification can also be found in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**, **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** and **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**.
The Henstead Union Workhouse, Swainsthorpe (1312) 2. What is the asset (church, house, ruin etc)? Converted workhouse The heritage value of the Henstead Union Workhouse is significant, because workhouses are some of the most important surviving physical reminders of Britain's social-welfare history. The workhouse was designed by John Brown, Norfolk's county surveyor, on a double-cruciform plan typical of Victorian workhouses. Rural workhouses of this scale and completeness are increasingly rare due to demolition and redevelopment. During World War I, parts of the workhouse were used as a Voluntary Aid Detachment (VAD) hospital from 1915–1919, caring for military and	The Applicant notes that this raised issue has been addressed within **8.8.1 Applicant's Comments on Written Representations [REP2-029]** – p.320. The Applicant adds the asset's value has been assigned following the framework described in the **6.19 Scoping Report [APP-288 to APP-296], 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report [APP-209]**, and **6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068]** guidance, drawing on relevant Historic Environment Record information and professional judgement. Additionally, those assets assessed to have a low or negligible value and located outside the Order Limits did not have a settings

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civilian patients and after the creation of the National Health Service (NHS) in 1948, the former workhouse became the Vale Hospital, caring primarily for elderly mentally ill patients. Whilst the construction of the pylons would have limited impact on the building itself as they are, for the mostpart, outside of the order limits, the building's significance is linked to its rural isolation, which reflects how Poor Law workhouses were intentionally placed at the edge of settlements. Introducing tall modern pylons would intrude visually on this historic rural setting. The National Planning Policy Framework states that "Heritage assets should be conserved in a manner appropriate to their significance; development that harms significance requires strong justification." The proximity of the pylons would: Break the historic legibility of the site Diminish its rarity value, which is one of its strongest assets Compromise visually important views toward and from the asset Large pylons can be considered to erode the dignity of a site whose historic narrative includes hardship, social care, and wartime medical service. A historic burial ground in located close to the construction area https://www.genuki.org.uk/big/eng/NFK/swainsthorpe/HensteadUnionBurialGround Construction activity for pylons—access roads, cable trenches, foundations—could result in loss of archaeological evidence, which contributes to the site's significance.	assessment undertaken. As they would not experience physical impacts there is no potential for significant effects as a result of change to setting for assets of these values. While some harm would still be possible, given their value and nature of potential impacts this would be at the very lowest end of the harm scale. In National Policy Statement (NPS) EN-1 (2024), instructions regarding the Applicant's assessment state (paragraph 5.9.9) '*The applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe these along with how the mitigation hierarchy has been applied in the ES*' and in several places refer to detail being proportionate to the importance/ significance of the heritage asset. The Applicant therefore considers that it has appropriately complied with relevant policy in the NPS (EN-1 (2024)) regarding assessment of impacts to non-designated heritage assets.
Sunken Lanes, Forncett St Peter They have not even mentioned holloways or the mitigation. Intend to cross an important sunken lane; Tabernacle Lane. 6. Has National Grid scoped out any heritage assets that you feel should be scoped in? Please list.	The Applicant acknowledges Pylons East Anglia's concerns around holloways and other protected lanes and confirms that where such lanes are identified in the Historic Environment Record or through established sources listed within **6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068]**, they have been considered within the assessment. Holloways, where recognised

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NG have never included the "Network of narrow peaceful rural lanes throughout the valley including sunken lanes" reference https://www.southnorfolkandbroadland.gov.uk/asset-library/imported-assets/luc-2001-rpa-a1-tas-rural.pdf and https://www.nationaltrust.org.uk/discover/history/gardens-landscapes/what-are-sunken-lanes 7. Is there anything else you would like to add? Ancient heritage asset, including hedgerows supporting biodiveristy and animal route ways, as well as community (but when do people matter?!). This is a key link holloway to the main road, much used. NG have never included the "Network of narrow peaceful rural lanes throughout the valley including sunken lanes" reference https://www.southnorfolkandbroadland.gov.uk/asset-library/imported-assets/luc-2001-rpa-a1-tas-rural.pdf and https://www.nationaltrust.org.uk/discover/history/gardens-landscapes/what-are-sunken-lanes	as protected lanes, are addressed in **6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068]** as well as **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**. For greater precision, the Applicant adds that the protected lanes are part of the non-designated heritage assets which have been assessed. Their value assessment is in accordance with **6.19 Scoping Report – Appendix A [APP-288 to APP-296]**, **6.20 Scoping Opinion [APP-297]** and the methodology set out in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS 068]**. The Applicant has sought to reduce, as far as practicable, impacts on protected lanes through routeing and siting and an ongoing iterative design process which has taken on board feedback at different stages of the Project. Further details on the impact of the Project on protected lanes can be found in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** includes measures to protect and reinstate historic landscape features including protected lanes, in addition to the commitment set out in H06 of **7.2 Outline Code of Construction Practice [Revision D]**. H06 has been updated following comments from several Local Planning Authorities in their Local Impact Reports. The protected lanes were assessed to have a low or negligible value. As they would not experience physical impacts there is no potential for significant effects as a result of change to setting for assets of these values. While some harm would still be possible, given their value and nature of potential impacts this would be at the very lowest end of the harm scale. National Policy Statement (NPS) EN-1 (2024) provides instructions regarding the Applicant's assessment in paragraph 5.9.9: '*The applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe*

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	these along with how the mitigation hierarchy has been applied in the ES'. In several places, NPS EN-1 (2024) refers to detail being proportionate to the importance/significance of the heritage asset. The Applicant therefore considers that it has appropriately complied with relevant policy in NPS EN-1 (2024) regarding assessment of impacts to non-designated heritage assets including the protected lanes.
Tacolneston, Forncett End & Tibenham NG's proposals totally ignore the long term impact of the permanent structures (pylons RG35-37 & 44-47 on a significant and unique historic claylands landscape in the Tass valley. These structures and the accompanying works, which NG have deliberately played down, will severely impact both in a temporary and a permanent sense on a wider historic landscape including significant collections of Grade II buildings in Tacolneston (1 already in a conservation area, another about to be designated). The key point about historic buildings is that they are not singular artefacts divorced from the landscape but that they sit in and are part of that landscape. Historic England note that "there is a statutory obligation on decision makers to have special regard to the desirability of preserving listed buildings and their settings". The setting of a heritage asset "is the surroundings in which a heritage asset is experienced". The "zone of visual influence" must also be considered (ref: The Setting of Heritage Assets, historicengland.org.uk). See comment above. NG have just identified a small number of buildings and totally ignored the impact on the whole historic environment of which these buildings are part. They have played down both the short term and the long term impact which their works will have on these buildings and on the landscape that they sit in. Changes to the setting will not be "temporary" for these buildings or the other listed buildings not mentioned in their heritage	The Applicant acknowledges Pylons East Anglia's concerns about Tacolneston, Forncett End and Tibenham and confirms that the setting's assessment of the heritage assets within these areas has followed the methodology set out in **6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068]**. The settings of all high and medium value designated assets have been assessed, with the magnitude of change within their setting considered in Environmental Impact Assessment terms where relevant; likewise, the settings of high and medium value non-designated assets have been assessed where they intersect the Order Limits or extend within the Study Area to the Order Limits. Assets of negligible or low value, or non-designated assets outside the 250 m Study Area, were not subject to settings assessments due to the lack of potential for significant effects. This approach, which has been discussed and agreed with stakeholders, explains how value is determined for listed buildings and why assessments may describe effects as temporary or less-than-substantial in appropriate contexts. In response to the question '*How is the value of listed buildings determined* and *what does medium mean?*', the Applicant notes that Value has been assigned following the methodology in **6.19 Scoping Report [APP-288 – APP-296]**, **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**, and **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and using relevant guidance and professional judgement.

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assessment. How do they decide that the value of listed buildings is medium and what does this actually mean? NG's stock answer that "there is likely to be a temporary minor adverse significance of effect on the asset (not significant)" is a complete untruth, misleading and unacceptable.	
Bounds Farm, Hungerdown Lane, Ardleigh I believe National Grid has completely and deliberately downplayed the massive detrimental effect their proposed Norwich to Tilbury line would have on the Asset At present I have concentrated on just this one Asset	The Applicant notes the raised issue has already been addressed within **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** – p. 382. The Applicant also gave full details about the mitigation considered for this asset within **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** – p. 350.
Church of St Mary (1112060), Ardleigh St. Mary's Church, Ardleigh is the landmark building in the village. With a height of 22 metres the church tower is the tallest structure in the historic centre. The dominance of the church and its setting within the landscape would be severely harmed by the plans to encircle it with an arc of pylons 50 to 60m high. Document 8.4.7 "Applicant's Comments on any Further Information or Submissions Received by Deadline 1" **[REP2-027]** states the following: “the assessment of permanent minor adverse significance of effect (not significant)…and Lower Less Than Substantial Harm” is appropriate “as the rural landscape would remain in place beneath and around the proposed overhead line”. This statement ignores the impact of the proposed infrastructure. Overall, the Applicant has greatly understated the harm that would be caused. Please also refer to **[AS-065]** "Report on Proposed Route Alignment and EACN Substation Siting in Ardleigh"	The Applicant has reviewed the assessment of the Church of St Mary in light of the respondent’s comments and agrees that the Project would be occasionally visible from it. The impact of the Project on the settings of the church was assessed in accordance with the methodology set out in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**. The setting assessment for this asset was informed by Historic Environment viewpoint HE25, **7.12 Visualisations - Part 9 of 9 [APP-351]**, by Landscape and Visual Impact Assessment viewpoint 3.11 (**7.12 Visualisations - Part 3 of 9 [APP-345]**) and also by a walkover of the settlement taking in numerous views into and out of the settlement and also between internal elements of the historic environment. As noted in **8.9.1 Applicant’s Responses to First Written Questions [REP3-074]**, no update is proposed for the HE25 viewpoint as it is located at a key view identified in the conservation area appraisal and is therefore considered appropriate. As the Project will be screened by mature vegetation and buildings the Applicant is satisfied that the conclusions reached in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**,of minor adverse and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** of lower less than substantial harm are appropriate. The

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	Applicant therefore proposes to make no changes to the assessment as the conclusion is agreed by the statutory consultee Historic England [**REP1-191**].
Ardleigh Conservation Area (CA26), Ardleigh As outlined in Ardleigh PC report **[AS-065],** there are a significant number of designated and non-designated heritage assets in the Ardleigh Conservation Area, resulting in a very high cumulative value. The value is further enhanced by the proximity to Scheduled Monument (1002146). Encirclement of the village centre by pylons would greatly harm the setting of these assets. The harm extends to the impact on key views from the Conservation Area identified in the Tendring District Council “Ardleigh Conservation Area Character Appraisal and Management Plan”. Figure 11.2 in Applicant's document **[AS-080]** (was [APP-217]) only shows 1 of the 17 listed buildings in the Ardleigh Conservation Area. Please also refer to **[AS-065]** "Report on Proposed Route Alignment and EACN Substation Siting in Ardleigh"	The matter concerning the assessment of Ardleigh Conservation Area and its setting has already been addressed. Please see comment 15.6 bullet point 1, 15.12 and 15.13 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**, p. 380-381, 388-389.
Crop mark site S of Ardleigh” (1002146), Ardleigh The proximity of pylons to this site would have a significant impact on the setting. As the nearest pylons would be the much more visually intrusive angle type, the impact is compounded. The Zone of Theoretical Visibility (ZTV) maps supplied by the Applicant show the visual impact from both the overhead lines and the EACN substation across the entire Scheduled Monument site. Document 8.4.7 "Applicant's Comments on any Further Information or Submissions Received by Deadline 1" **[REP2-027]** states the following: “the assessment of permanent minor adverse significance of effect (not significant)…and Lower Less Than Substantial Harm” is appropriate “as the rural landscape would remain in place beneath and around the proposed overhead line”. This statement ignores the impact of the proposed infrastructure.	The matter concerning the assessment of the ‘Cropmark site South of Ardleigh’ (1002146) and its setting has already been addressed. Please see comment 15.15 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**, p. 390-391.

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Overall, the Applicant has greatly understated the harm that would be caused. Please also refer to **[AS-065]** "Report on Proposed Route Alignment and EACN Substation Siting in Ardleigh"	
"The Ardleigh cropmark complex", Ardleigh The Applicant's construction plans extend to the edge of the Scheduled Monument site. It is considered very likely that this area contains archaeology of similar potential to the Scheduled Monument. The Applicant has been advised of this by Ardleigh PC since the first consultation in 2022. The Applicant's plans in Figure 11.4 (Page 13 of 24) show this to be a "priority geophysical survey" area, as opposed to a "priority archaeological trial trenching" area, despite the acknowledged limitations of geophysical surveys in the area, due to the local soil conditions (the issue was identified in an Applicant's report from 2024). NPS EN-1 (5.9.5 & 5.9.6) and the NPPF (211) are clear that areas with such a high archaeological potential should be avoided. Also, in ExQ1 the ExA states the following: "in the Secretary of State's decision letter for the Five Estuaries offshore wind farm, dated 17 December 2025, it was stated that: 'The Secretary of State considers preservation by record does not amount to mitigation of harm for archaeological remains…'" Many non-designated heritage assets did not appear on the Applicants's maps until the Rev B versions were issued during Examination. These are still considered to be incomplete. Please also refer to **[AS-065]** "Report on Proposed Route Alignment and EACN Substation Siting in Ardleigh"	The Applicant notes that 15.9 bullet point 1 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**, p.385 replies to a comment about 'The Ardleigh cropmark complex' giving more details about the programme of archaeological evaluation which has been discussed and agreed with Local Planning Authority Archaeological Advisors and Historic England.
Chatham Hall, Great Waltham, Essex In NG's Environmental Statement Vol 6, 6.11.A1, when referring to Chatham Hall, they say: 'The setting of the asset makes a considerable contribution to it's value ……". So why do they conclude after the destruction of hedgerows and trees, a pulling	Chatham Hall (1338512) The Applicant notes that this raised issue regarding Chatham Hall has been addressed recently. Please refer to the Applicant's Deadline 3 response to the Local Impact Reports from Chelmsford

Matter	Applicant Response
location associated with pylon TB136, associated construction works, four SuDS basins, temporary haul road and bellmouth works that Chatham Hall will only have a 'temporary minor adverse significance of effect on the asset (not significant)"? The setting of Chatham Hall as it is today will be destroyed forever	City Council, found in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** – ID 8.201, p. 414.
Ball's Farm, Great Waltham (in some documents it is referred to as Balls Farm) I disagree with NG's assessment that Ball's Farm will have "….a temporary moderate adverse significance of effect on the asset (significant)". It will have a permanent high adverse significance as the house will be surrounded by three pylons and is extremely close to one of these pylons and therefore will forever be affected by the risk of EMF exposure and noise (humming/crackling). NG did not do any assessment on this heritage asset, yet it must be one of the most affected listed buildings on the Norwich to Tilbury route. Listed buildings have limited foundations, so the risk to this heritage asset is significant, as it will be 30m from construction traffic.	Ball's Farmhouse (1305428) The Applicant notes that this raised issue regarding Ball's Farmhouse has been addressed recently. Please refer to the Applicant's Deadline 3 response to the Local Impact Reports from Chelmsford City Council, found in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** – ID 8.201, p.418. Also, the Applicant confirms that an assessment has been done on this heritage asset as well as its setting following the methodology outlined within **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**. The assessment has been informed by site visits, aerial and street-view imagery.

7. Applicant's Comments on PEA Appendix H - Archaeology 4081 Fordham Essex [REP3-136]

7.1.1 The Applicant provides its comments on Appendix H of the PEA Response [REP3-136] below.

Table 7.1 Applicant's Comments on PEA Appendix H [REP3-136]

Matter	Applicant Response
Representation Regarding Asset 4081 — Roman Villa & Hunting Lodge Complex, Fordham **1. Significance and Valuation of Asset 4081** In my view, Asset 4081 — the Roman hunting lodge at Fordham — has been significantly undervalued by National Grid. The designation of a medium value fails to reflect the true archaeological importance of this site. Of particular note is the discovery of an indoor fountain (piscina), which NG has not mentioned at all in its assessment. This feature is of exceptional rarity: only two such fountains have been found in the UK, and only a handful exist across the rest of Europe. Further significant finds include Roman and Saxon burial grounds. Rural Roman burial grounds are rare; those of high status, evidenced by lead-lined coffins, are rarer still. A third Roman burial remains in situ, with further burials likely. NG has also failed to mention a complete child Saxon burial, nor the subsequent discovery of remains of at least four other individuals. In addition to the bathhouse and hunting lodge, (a substantial quantity of deer bones have been recovered, some bearing arrow damage), the site encompasses Roman and Saxon burial grounds of considerable importance. One find from this site was featured in	Asset 4081 has been identified as medium value by the assessment. For it to be recorded as high value, as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** – Annex C Table 3.2, it would need to be of demonstratable Schedulable quality which assessment concluded it was not. The Roman burials presence of Saxon material was acknowledged in the baseline assessment **[APP-209]** – paragraph 3.5.87. TB47 was moved north-east to avoid direct physical impact to the archaeological site in this area. The new location for pylon TB47 has been geophysically surveyed, with no results of note, and will be evaluated by archaeological trial trenching to determine if mitigation is required. The setting of the asset has been acknowledged in the assessment **[APP-209]** – paragraph 3.5.88 including the views towards Colchester and based on the asset value the impacts are deemed to be accurate following the impact assessment methodology. Landscape and visual effects on the same stretch are illustrated by general Landscape and Visual Impact Assessment (LVIA) Viewpoints 4.20, 4.24, 4.25 and 4.27 (**7.12 Visualisations - Part 5 of 9 [APP-347]**) and by Heritage Viewpoint HE 26 (photomontage) (**7.12 Visualisations - Part 9 of 9 [APP-351]**), which together confirm that the amended alignment

Matter	Applicant Response
Britannia, published by the Roman Society — a major academic publication. The site is almost certainly connected to three other Roman sites located approximately half a mile away in Fossetts Lane. NG's proposals would pass through those sites as well. **2. Inadequacy of Mitigation Assessment** I strongly dispute NG's assessment that the post-mitigation impact is only 'low adverse' and 'minor'. NG's own documentation acknowledges that a portion of the asset would be destroyed entirely, and that the setting would be irrevocably harmed by the proximity of the proposed pylons. Destruction cannot be mitigated. The current setting of the site commands views towards Roman Colchester on the hill — the likely origin point of visitors to the complex in antiquity. A 50-metre-high pylon in this setting would cause permanent and irreversible harm to that historical landscape. This is not a matter capable of mitigation, and it is inappropriate to characterise the residual harm as minor. Pylon TB047, specifically, would be positioned directly above known Roman archaeology situated beneath our southern dig site fence and extending approximately 30 metres beyond it. This area was planned as Phase 4 of the excavation; the dig is currently in Phase 3. I draw the Inspector's attention to the following passage from the Secretary of State's decision letter for the Five Estuaries offshore wind farm, dated 17 December 2025: *"The Secretary of State considers preservation by record does not amount to mitigation of harm for archaeological remains…"* This principle applies directly here. NG's proposed approach of surveys, trial trenching, removal of finds, and demolition of any structural remains (walls, floors and the like) constitutes destruction	minimises intrusion into key views. The Applicant fully recognises the importance of safeguarding archaeological remains of national significance, and our approach is aligned with this principle. The approach set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** and secured through Requirement 5 within **3.1 Draft Development Consent Order [REP3-004]** already includes provision for a range of mitigation strategies, including preservation in situ, should highly significant remains be identified. The Applicant notes the inaccuracies raised regarding the dates of investigation fieldwork; however, the assessment was conducted using a variety of sources both third-party published and fieldwork assessment outlined in the baseline report and Environmental Statement chapter and the historic environment baseline presents a reasonable basis for assessment, as outlined in **6.11 Environmental Statement Chapter 11- Historic Environment [AS-086]** – paragraphs 11.4.29–11.4.32. The Applicant acknowledges the community participation provided by the excavation; however, this does not directly contribute to the assessment of heritage values assigned in the Project adopted from current guidance to an extent that the value of the asset would be elevated. Planned fieldwork by the commenter will be able to continue once the use of the stringing area has ceased. All designated and non-designated heritage assets within the 250 m study area have been assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**. The non-designated assets that intersect the Order Limits or non-designated and designated assets whose settings extend to the Order Limits, are evaluated in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**, whilst an assessment of the level of harm designated assets would experience is recorded in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage**

Matter	Applicant Response
by record, not mitigation. It would permanently deny the local community, future researchers, and future generations of archaeologists — amateur and professional alike — the opportunity to study these remains in situ. **3. Factual Inaccuracies in NG's Evidence** NG's documentation contains material factual errors that undermine the reliability of its assessment: • NG states that the dig ran until 2021 and has concluded. This is incorrect. The excavation is still active and is expected to continue for several years to come. • The geophysical surveys were conducted in 2013 and 2014. NG's characterisation of the timeline is therefore also inaccurate in this respect. • NG makes no mention of the indoor fountain (piscina), the child Saxon burial, the additional Saxon burials, or the high-status Roman burials in lead-lined coffins. **4. Community and Educational Value** NG's assessment entirely disregards the profound community and educational value of this ongoing excavation. The impact of the scheme will fall not only upon archaeology in the ground, but upon the community that has been working on this site since 2015 — a community that, in my submission, should be allowed to continue. Participants in the excavation have included: • Students from across Europe; • A professor of archaeology from Argentina, who returns as a regular participant; • A family from Australia; • Approximately 30 regular volunteers from Essex and Suffolk; • Children from the Colchester branch of The Young Archaeologists Club, who visit and participate in the dig — a	**Assets [APP-215]**. The moated site raised by Appendix H has been assessed as a separate asset: 4104 based on information available to the Project at the time of assessment.

Matter	Applicant Response
genuinely rare opportunity for under-16s to engage with live archaeological fieldwork. This is not merely an asset to be assessed in isolation. It is an active, living archaeological project with local, national, and international reach. **5. Additional medieval site** Amongst the three other Roman sites (between pylons TB043 & TB044) in Fossetts lane there is a medieval site. This been on the HER for a long time and is listed as a probable moated site. It is sited right next to the pylon TB043, so is under threat. Geophysics and other research suggest it dates from at least 1250 (dated coin found), and pottery finds suggest it existed until the late 16th, maybe early 17th century. Because of the dateable finds and its position in the parish, this is highly likely to be the lost Norman manor hall of Great Fordham (aka Fordham Magna). The sites of the three other manors are known as later halls and still exist, while the location of the Great Fordham manor was "lost to memory" even in the 18th century. **6. Conclusion** The whole of this area is of local and national importance. Asset 4081 has been systematically under-assessed by NG. The rare finds, the ongoing community excavation, the burial grounds, and the irreplaceable setting all demand a higher significance rating and a genuine re-examination of the proposed route in this area. I also note, with regret, that I have raised these matters with National Grid over a period of three years without any meaningful engagement with the substance of my concerns. I ask the Inspector to give proper weight to this representation.	

8. Applicant's Comments on PEA Appendix I - Heritage Bounds Farm [REP3-137]

8.1.1 The Applicant provides its comments on Appendix I of the PEA Response [REP3-137] below.

Table 8.1 Applicant's Comments on PEA Appendix I [REP3-137]

Matter	Applicant Response
The Asset known as Number 11477423 (Bounds Farm) is worth more than its medium value assigned by NG. It is Grade 2 listed, and NG has chosen to site its substantial substation and adjacent substations (for Five Estuaries and North Falls), along with the Tarchon Interconnector, with a boundary just 10 metres away from the boundary of the Asset. The Asset is referenced in F.H Erith's book 'Ardleigh in 1796' on page 58, and is of historical interest to the village. Also listed in F.H. Erith's book is reference to Grade 2 listed Asset number 1112091, along with Charity Farm both in Hungerdown Lane, Ardleigh, and Badley Hall in Little Bromley Road, Ardleigh. NG states in its baseline value (3.4.753) that "the building is two storeys tall," whereas it is in fact three storeys tall. Therefore, as the Asset is taller than NG suggests, there is more impact to the Asset from NG's proposed substation. NG states in its baseline value (3.4.754) that the Asset is "screened from view by well-established hedge that lines the road." This is not a well-established hedge, but rather a scrubby and badly maintained (by the current owner of the farmland opposite the Asset) hedge that will clearly be scrubbed out by NG anyway. Therefore that cover will be zero (downplaying by NG). There is	The description of Bounds Farm (1147743) as two-storeys relates to the official listing description held by Historic England which describes the building as two-storey with attics. The other concerns raised by the document have been addressed within **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** – p. 382 and **8.8.1 Applicant's Comments on Written Representations [REP2-029]** – ID REP1-438 p 317–318 the latter of which have been repeated here. The Applicant has assessed this listed building following the methodology outlined in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**. The assessment has been informed by site visits and aerial and street-view imagery. Regarding the hedge the Applicant has also considered standard mitigations detailed within **7.2 Outline Code of Construction Practice [Revision D]** such as the commitment reference H06 which sets out '*Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches).* […] *Where such features cannot be retained, replacement* […] *will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).*' The Project has also examined whether additional mitigation measures would be beneficial. The Applicant concluded that the Project would impact views away from the asset to the

Matter	Applicant Response
currently a 1 metre hedge directly in front of the Asset with a small 1 metre high gate, and a 1.7 metre hedge to the west of the 1 metre hedge, along Hungerdown Lane (these all planted by the current owners of the Asset). There are also 4 trees in the front garden of the Asset, none of which will in any way reduce the impact of pylons TB1, TB2, TB3 and TB4. NG has failed to emphasise the full impact on the Asset, and is deliberately downplaying this impact. In addition it fails to mention that pylon TB5 is situated to the south west of the boundary of the Asset, and is therefore highly visible from the Asset and from the gardens of the Asset. NG also states that “Due to the proximity of the Order Limits the Asset’s setting extends into them. ”This is an Asset that is Grade 2 listed and held for the nation, and NG fails to take its true value into account. Indeed all the private heritage buildings along the Norwich to Tilbury line are cared for by the owners for the nation. Under NG’s Assessment of Construction Effects to Designated Heritage Assets (P 119) it states that “the construction stage of the Project would alter the wider rural setting of the Asset through the introduction of pylons TB1, TB2, TB3 and TB4, a pulling location associated with pylon TB5, underground cable works, overhead line crossing protection works, bellmouth works, temporary infiltration drainage works, a permanent bund, the East Anglia Connection Node Substation and the temporary haul road. These works are likely to introduce plant noise and movement into the rural setting of the Asset. These works are at their closest 40m to the east of the Asset and would be visible. The magnitude of impact is considered to be **medium adverse**.” The origins of the Asset date back to the 16th century and, as was the custom in those days, the Asset has in places very small foundations. If NG introduces plant noise and movement into the rural setting of the Asset it is likely that the structure of the Asset will suffer. How will NG mitigate for large cracks in walls and the possible instability of the Asset?	farmland to the east and the tops of pylons TB1 to TB4 may be visible over the top of mature tree cover to the south. However, further mitigation would not materially change the assessed impact. In particular, additional screening planting was considered but found unlikely to reduce the effect meaningfully and could potentially alter the existing character of the setting, making it unsuitable. Therefore, additional mitigation measures are not considered appropriate. Operational noise from the proposed substation is assessed in **6.14.A3 Environmental Statement Appendix 14.3 - EACN Substation Operational Noise Assessment [APP-259]**. The assessment also includes consideration of the cumulative effects of the proposed North Falls and Five Estuaries substations. The assessment indicates that adverse effects from operational noise are not expected at Bounds Farm. Construction noise and vibration is assessed in **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]**. Construction noise and vibration would be managed via commitments in **7.2 Outline Code of Construction Practice [Revision D]** and **7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [Revision B]**. These mitigation measures ensure that best practicable means (BPM) would be implemented by the Main Works Contractor(s) to reduce the effects of noise and vibration during construction as far as practicable. Further detailed construction noise and vibration assessments would be undertaken by the Main Works Contractor(s) based on their specific methodologies. Through routeing and siting the Applicant has sought to reduce as far as practicable potential impacts on the historic environment, including listed buildings. It has been assessed that during construction and operation phases this asset will experience a temporary, during construction and permanent, during operation, moderate adverse significance of effect (**6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**) and a Mid Less Than Substantial Harm (**6.11.A7**

Matter	Applicant Response
Under the heading of 'Mitigation' NG states that "Changes to the setting would be temporary and would be removed once the construction phases is completed. No additional mitigation measures are proposed during the construction phase as any measures designed to lessen the value of the farmhouse is **medium**, and the magnitude of impact prior to mitigation is considered to **be medium adverse**." Again, failure by NG to properly assess, and to typically downplay the effects on any Asset that happens to be in their way. The Operational (and Maintenance) Effects to Designated Heritage Assets (p.1049) again refers to the Asset. It admits that the "elements of the Project would be visible from the Asset, and they would alter the character of the rural setting of the Asset." It then goes on to state that "the magnitude of impact is considered to be **medium adverse**." Under the heading of 'Mitigation' it states that "no additional mitigation measures are proposed during the operation phase as any measures designed to lessen the visual impact of the Project would be of a scale that would visually adversely alter the setting of the Asset." Under the heading of 'Significance of Effect' NG states that "there is likely to be a direct, permanent **moderate adverse** significance of effect on the Asset **(significant)**. In other words, NG is very well aware of the long lasting and permanent damage it would cause to the Asset. It also makes it very apparent that it is disregarding any form of responsibility to mitigate the extreme harm it will cause to this rural Asset. NG fails to make any reference to the operational noise of the substation once installed. In addition it fails to refer to ongoing dust and light pollution which will certainly be suffered by the Asset should the work go ahead.	**Environmental Statement Appendix 11.7- Assessment of Harm to Designated Heritage Assets [APP-215]**).
The current owners of the Asset are [redacted text]. As a result of their ages and [redacted text] they would like to move from the Asset to a smaller house with a much smaller garden. The Asset has been on the market since 1st June 2025, and within the last two	The Statutory Consultation route for the N2T pylons has carefully avoided homes, and most of the residential property along the route that are marginally impacted can be protected from visual impact with screening. The pylon routes have followed several

Matter	Applicant Response
weeks has been removed from the market. During that ten month period just one person has viewed the Asset. All other potential buyers have been put off even viewing the Asset by NG's proposals just 10 metres from the boundary of this Grade 2 listed building. This proves that NG has undoubtedly **blighted** this National Heritage Asset. NG has adopted the cowardly action of downgrading the impact on the Asset and simply refusing to do anything about it.	principles including Holford rules, current pylon routes, consideration to underground cable instalments, archaeological features, Listed Buildings and views (Design Development Report Norwich to Tilbury). A combination of these principles has provided a pylon route that will provide the least impact within planning guidelines and in line with National policy statement EN-5. Potential impacts on property prices is not a material planning consideration for the purposes of a DCO application. Separate to this point, the Secretary of State has asked that the DCO application include an assessment of the likely significant environmental effects in the form of potential impacts on property prices. The Environmental Statement (ES) contains an assessment on this. It concluded that there is no evidence of any significant environmental effects on house prices because of the Project. Although not part of the Environmental Impact Assessment (EIA) process it is relevant to observe that any impact of the Project on residential properties are potentially capable of being dealt with through statutory nuisance or compulsory purchase compensation regimes (subject to the requisite criteria being met). The Beauly-Denny 2024 report was commissioned by Scottish renewables and conducted by BiGGAR Economics . The report focused on house prices along the 137 km (615 x 53 m pylon) transmission route since it became operational in 2015. The study focus is mainly related to buyer preferences when faced with newly commissioned pylons and infrastructure in making offers, and examines ranges over 15 years of house price and house sale data. In summary, it demonstrates that the average house value remained consistent in the areas where the new pylons and infrastructure were constructed, and, over time, supply vs demand and the general market trends seem to dissolve any theory that pylons devalue property prices. It concludes that: • House prices in affected areas (Highland, Perth and Kinross, Stirling, Falkirk) mirrored broader market trends. Drivers such

Matter	Applicant Response
	as interest rates, cost of living and supply of houses have a greater impact. In general, no significant issues have arisen in recent years because of the Beauly-Denny power line • Concerns are more likely to arise when a property is in very close proximity to pylons or a substation. The main concern would likely be the visual impact that affects the amenity of a property. However, individual preferences vary hugely among different buyers and opinions on certain properties are entirely subjective. Some potential buyers could be deterred while others are entirely unbothered. We note that properties that have a view of the proposed infrastructure do not typically qualify to make a claim as currently UK law does not require developers to compensate for losses because of changes or a loss of view. The current owners have access to the Land Compensation Act 1973 that provides the legislation for their circumstances.
The current owners have tried to communicate with NG, having met with a representative from NG and one from Fisher German on 19th June 2024. They promised to come back to us within two weeks with answers to the owners' very natural concerns. Since that date 21 months ago, the owners have heard nothing. Shame on NG for such a cowardly refusal to acknowledge their responsibilities! NG claims to have 'consulted' with local communities, whereas the reality is that it has totally failed to do so.	The Applicant has had an ongoing consultation and engagement process with affected landowners for over two years including project wide in person consultation events in 2024, and in person targeted consultation events in 2025 where proposals were reviewed following feedback from the 2024 consultation. At all stages one to one meetings have been offered with either the landowner and/or their appointed agent. This has been supported by updates on the project by mail and on the project website. The Applicant refutes any claim that consultation has failed. In this instance the AP appointed a land agent with whom Fisher German have regular update meetings. The Applicant is surprised to hear this. Fisher German believed the AP's agent to be aware that following changes to the alignment the AP is now classed as Category 2 with no land rights being sought and no Heads of Terms issued. Fisher German will take this as an action to correct any misunderstanding with the AP's agent.

9. Applicant's Comments on PEA Appendix J - Heritage Flordon Hall [REP3-138]

9.1.1 The Applicant provides its comments on Appendix J of the PEA Response [REP3-138] below.

Table 9.1 Applicant's Comments on PEA Appendix J [REP3-138]

Matter	Applicant Response
Flordon Hall in a significant Grade II* listed property. It has medieval origins, with later Tudor alterations. A significant amount of the original fabric survives and it clearly shows the evolution from a medieval hall house into a later gentrified residence. The building reflects centuries of continuous occupation and status. It is tied to the development of a rural estate and local social hierarchy. The Hall's historical significance is further highlighted by its association with the Buttevelyan family, who owned the land in AD1103 and the Kemps, who owned a large manorial estate by the end of the 16th century. The Hall has been a central part of the Flordon village's identity and continues to be a symbol of the area's heritage. It is intrinsically linked to the parish church, St Michael and All Angels, Flordon, also a grade 2* building. Many occupants of Flordon hall are listed as either Patrons or clergymen of the church dating back to the 17th c. The associated building/barn* are Grade II listed and are excellent representative examples of traditional Norfolk rural buildings. *One building has been identified as the 'piggery' by the applicant. It is in fact a substantial two store Dower House (very clear if you actually look at the building), with a single story cob barn attached, which has a date stamp of AD1134.	The Applicant notes than some of the raised issues have been addressed in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings [REP2-028]**. The Applicant has assessed the assets following best practice and guidance as per the assessment methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** – Annex C. This includes the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)[40]. In the baseline report **[APP-209]** – paragraph 3.2.548 the Applicant specifies the importance of the shared setting of these assets and its contribution to their value. The use of the name Piggery for asset 1172231, identified by the Applicant, is derived from the official listing name from Historic England and its former possible use as a dower house is acknowledged in the baseline report **[APP-209]** – paragraph 3.2.547. As described in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** the intervening landscape between the asset and Project includes

[40] Historic England (2017) *The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)*

Matter	Applicant Response
Whilst the Applicant acknowledges that the Hall and Barns are located close to each other, they clearly just see them as three listed buildings. It should be noted that the site's importance is greater than the sum of its parts. It's not just three buildings; it's a complete historic environment. The Hall shows how people lived, the barns show how they worked, and the landscape ties it all together. Together they form a well-preserved, legible historic estate, which is why the whole site and landscape is such a significant heritage asset. The proposed pylons on our land (RG19-RG24) would pass from North to South West of the complex, the closet of which (RG21) would be some 200 m away but RG22 will have the most visual impact at 350m. The frontage of Flordon Hall faces East, so the pylons will be seen from the rear but at that distance they will have a profound impact and dominate all views west over the land. No appropriate viewpoint image has been produced to make an assessment of this effect. However, a viewpoint image was taken from the Long Lane, to the south east of the Hall so its focus is taken from an oblique angle. It does however, give some indication of the likely appearance of the proposed development and how it will change an otherwise agricultural landscape. There are hedgerows and trees between the listed buildings and the fields containing the proposed development however, the pylons will be clearly visible from the immediate setting of the Hall, not least because the land height increases as you look towards the pylon locations. In terms of impact, it is noted that significant effects are identified up to a distance of approximately 1.5 km for landscape receptors and up to a distance of approximately 2 km for visual receptors. However, in terms of significance, the properties at No 70-73 Flordon Rd and the property, 'High Hopes' will have pylons RG21 and RG22 about 100m from their kitchen window. These are tenanted properties belonging to Flordon Hall and let at affordable rates for local people. As they are in the wider curtilage of the Hall it is understood that they should be afforded similar protected	buildings, copses, and mature tree-lined hedgerows that would interrupt and break up the views from the asset towards the Project. The principal elevation of the asset faces east, and views eastwards would not include or be impacted by the Project. Nor would the Project impact the asset's relationship and intervisibility with the Farmstead and its two Grade II listed elements (Piggery 60 Yards South of Flordon Hall (1172231) and Barn to Flordon Hall (1373055)). The asset can be viewed from Long Lane c.480 m to the south-east, and this view would potentially include the top of pylons RG21 and RG22 cresting above mature tree-lined hedgerows and copses to the north-west of the asset. The matter submitted suggests the photo provided in Plate 22 – Annex D of **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** is not appropriate for assessing the impact of the Project. It should be noted that setting of heritage assets was not solely informed by walkover survey undertaken in Annex D, but also aerial and street-view imagery, and viewpoint assessment. This includes historical Viewpoint HE1 to the east of Flordon Hall, giving a view to the front of the hall with the Project behind – **7.12 Visualisations - Part 8 of 9 [APP-350]**. The Applicant is, therefore, confident in its assessment that the Project would cause a low adverse magnitude of impact prior to mitigation resulting in a direct, permanent moderate adverse significance of effect (significant). The Applicant is also confident in its conclusion that the asset would experience Mid Less Than Substantial Harm. In its written representation **[REP1-191]**, Historic England, statutory heritage advisor to the Secretary of State, agrees with the Applicant's assessment of Flordon Hall and so the Applicant is satisfied with the assessment. With regard to the piggery and the barn, whilst many of the elements of the setting of the hall are shared with these assets, the Applicant considers their settings to be more integral to the Flordon Hall complex with the wider agricultural landscape not as prominent an element of their settings as it is for the hall.

Matter	Applicant Response
status as the Hall and Barns. The effect on these properties and the property 'Gable End', will be devastating. The applicant's conclusions about harmful impact seem to be based on views from the listed buildings rather than views of them in their landscape setting. The Applicant considers that the assessment of permanent moderate adverse significance of effect (significant) (**6.11.A2 Environmental Statement Appendix 11.2 – Historic Environment Assessment Tables [AS-070]**) and Mid Less Than Substantial Harm (**6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**) to this listed building is appropriate and reflects the harm to the value of this asset. In this process they conclude the following: Flordon Hall: It is concluded that the asset would experience Mid Less Than Substantial Harm. Dower House or Piggery: It is concluded that the asset would experience Lower Less Than Substantial Harm. Long Barn: It is concluded that the asset would experience Lower Less Than Substantial Harm. South Norfolk District Council own experts disagree with these assessments and have written to the ExA to that effect. In relation to Flordon Hall state "It is considered that Flordon Hall should be assessed as incurring a higher level of less than substantial harm than National Grid indicates". They conclude that the assessment should state; "Flordon Hall: Moderate adverse significance of effect (significant); High less than substantial harm. The Applicant carried out a walk over exercise, taking photos of what they considered important within the landscape of the Order limits. One of the photos, noted as Plate 22, "shows a Farmyard with the Barn to Flordon Hall and Piggery 60 yards south of Flordon Hall, looking east". They also note the following: "Known Heritage Assets 2.1.23 The farmyard, where are located the Grade II barn to Flordon Hall (1050698) and the Grade II Piggery 60 yards south of Flordon Hall (1172231), is visible from	The Applicant acknowledges the comment regarding the spoil shown in Plate 28, but does not agree with assessment of significance of the adjacent hole.

Matter	Applicant Response
the Order Limits (Plate 22). As for the Flordon Hall (1050698), it is not visible due to a tree line to its west". The photo appears to be an attempt to hoodwink the planning process by reducing the impact that pylons will have on this historical site. This action appears common place throughout the planning application. What the photographer failed, or possibly, intended not to notice, was that if they had taken the photo a few yards to their right, you would clearly see Flordon Hall and the two listed barns in the picture. So, the obverse photo would clearly show just how significant and dominating the pylon at that location will be from the Hall and barns. I add the following paragraph as it demonstrates the significant way the Applicant has chosen to twist the way a setting is described and the ignorance that has been used to describe certain settings. Plate 28 A topsoil pile along Wymondham Road, looking north-east. 2.1.30 2.1.31 "A top-soil pile was witnessed during the walkover survey. The pile looked to be the soil from a hole which had been intentionally dug in the area next to the field entrance along Wymondham Road (Plate 28). The area is principally agricultural in use and is subject to modern farming practices including large drainage ditches". What this actually shows is a pile of spoil left after the sugar beet have been harvested. The beet is stacked on the edge of the field next to the road, before being loaded for onward transportation and processing. This practice has been carried out for generations and is how we get most of the white sugar used in the UK. The hole they note is extremely significant. It is understood that this is one of the sites of a clay pit which was dug out to provide the clay to form the handmade bricks for Flordon Hall and the Dower House. Flordon Hall and the area around the Hall and farm create a setting that has inspired many artists. The world renown artist, George Edward Mackley MBE (born 1900 in Huntingdon, died 1983 in Tonbridge, Kent) was an English wood engraving artist. He created many pictures in and around Flordon Hall. One of his pictures and	

Matter	Applicant Response
widely considered to be Mackley's finest wood engraving, was made at the Hall and entitled, "Threshing at Flordon Hall". This subject was chosen as the front cover illustration for the retrospective show on Geroge Mackey's wood engravings staged by Blond Fine Art in London in 1995. It not only depicts threshing but also the rural tranquillity around the Hall. The natural environment around Flordon Hall is typical of rural south Norfolk but with some particularly interesting ecological features because of its position in the River Tas valley. The surrounding land is mostly arable farmland and pasture. Fields are divided by mature thick hedgerows and tree lines, which are important wildlife corridors. Small copse and spinney as well an ancient woodland (Nortons Wood 52.542956, 1.231616), break up the open landscape. These features create important wildlife corridors, allowing species to move between habitats in an otherwise open farming landscape. The applicant states that they have an Exclusion zones Commitment in respect to ancient woodland which can be found at Reference B17 in Table 6.1 of the outline CoCP **[APP-300]** and refers to the provision of a 15m minimum exclusion zone from the edge of ancient woodland. This has been totally disregarded in respect of Nortons Wood mentioned above, where there is no exclusion zone. For many years we have been working with Norfolk Farming and Wildlife Advisory Group (FWAG) who support farmers in South Norfolk to manage land for wildlife enhancement rather than operating specific, named public nature reserves. They have provided us with advice on biodiversity and ecological improvement across the farm. As a result we have created a substantial County Wildlife Site which has been recognised by South Norfolk County Council in the Norfolk Local Nature Recovery Strategy (LNRS) and the Norfolk Biodiversity Information Service (NBIS) which is a Local Environmental Record Centre holding information on species, geodiversity, habitats and protected sites for the whole of the county of Norfolk . This area, which is adjacent to the location of pylon RG24 has been identified as an Area of Particular	

Matter	Applicant Response
Importance for Biodiversity (APIB). The area is recognised as having particular importance for biodiversity through local, national or international designations. Using the corridor principle for wildlife, the site is linked via permanent grass land and a chalk stream which is a tributary of the river Tass, to Flordon Common with its SSSI and the SAC. Flordon Hall is a short distance from Flordon Common, the key ecological feature in the area. It contains a Site of Special Scientific Interest (SSSI) which is of national importance and Special Area of Conservation (SAC). The SAC designation places it among the most important conservation sites in Europe; it is an exceptional and fragile habitat. The SAC is home to rare species, including the Desmoulin's whorl snail. Other notable wildlife includes Water voles, Barn owls and Barbastelles Bats. Both areas butt up to Flordon Hall land and both areas are endangered by pylon RG23 and RG24. With the SAC included, the landscape around Flordon Hall is not just farmland. The presence of the SAC means the area is part of a carefully protected ecological network, where water, soil, and land use are tightly linked. The area is peaceful farmland sitting next to a rare, spring-fed wetland of European importance, where tiny changes in the environment can have big ecological consequences. So in conclusion, I consider scale of the intrusion by introducing 50m high pylons on 50m Sq. concrete rafts would result in a high level of less than substantial harm to the significance of the grade II* listed building and associated barns. Whist the Applicant has made a subjective assessment as to the harm to these historic buildings, they have only provided sufficient information and evidence to support that subjective assessment. It is therefore appropriate to conclude that they have misconstrued the facts to support their stated aim and whether by intent or ignorance they have misled others to become complicit in that aim.	

Appendix A. Russell Harris KC Opinion – Response to PEA Appendix E [REP3-133]

nationalgrid

NORWICH TO TILBURY DCO EXAMINATION

Opinion

1. At deadline 3 of the Examination, Pylons East Anglia Limited submitted a legal opinion from Mr Charles Banner KC[1].

2. It raises three points.

The Ambit of the Critical National Priority (CNP) policy

3. First, when considering the CNP contained within EN-1 (2024) presented to the Houses of Parliament in November 2023 (hereafter EN-1 2024)) Mr Banner KC seeks to separate what he calls the "**principle of the infrastructure in question"** from **"the particular means of delivering it".**

4. Mr Banner KC asserts that the "better" interpretation of the CNP "presumption" is that "**the presumed need is for the principle of the infrastructure not the particular means of delivering it**".

5. This is an unclear, unnecessary and incorrect rewriting of the policy statement which confuses the CNP policy with CNP presumptions and introduces a concept of "presumed need" which is not contemplated by the Policy Statement.

6. Mr Banner KC criticises the Applicant for a so-called elision of the recognition of much needed new high voltage grid infrastructure with "**the particular means of doing so proposed by the Project.**"

7. The Applicant disagrees with this approach. It relies on the Policy Statements as drafted and approved by Parliament. Their meaning is clear and straightforward.

8. They identify the critical and real (not presumed) national need for power lines and the most appropriate means of meeting that need in the circumstance of each case.

9. Paragraph 4.2.4 of EN-1 (2024) states that "Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure".

10. Before considering the very particular (and remarkably powerful) terms of CNP policy it is relevant to identify the nature of the pressing need which drives it.

[1] The preferred approach to appellation in these proceedings as indicated at ISH1.

11. In terms of the nature of the pressing need which drives the creation of this CNP policy, the provisions of EN-1 which are most apposite and clear are set out below.

12. Para 3.2.6- 8 (EN-1,2024) are deliberately emboldened. They provide:

> **3.2.6 The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure which is urgent, as described for each of them in this Part.**
>
> **3.2.7 In addition, the Secretary of State has determined that substantial weight should be given to this need when considering applications for development consent under the Planning Act 2008.**
>
> **3.2.9 The Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS.**

13. The specific need for **electricity infrastructure** is set out in Section 3 of the Policy Statement.

14. Para 3.3.68 makes specific reference (unusual in a National Document) to the geographical hot-spots of most need and includes the need (identified by NGNESO and since ratified by the independent NESO) for "substantial reinforcement in East Anglia to handle increased power flows from offshore connections." [2]

15. Para 3.3.72 provides that "connecting the volume of offshore wind capacity targeted by the Government will require not only new offshore transmission infrastructure but also reinforcement to the **onshore transmission network** to accommodate the increased power flows to regional demand centres". (emphasis added).

16. Para 3.3.73 emphasises the temporal urgency of making this happen. "Due to the time required to plan, approve and construct the required new onshore transmission infrastructure, to date the completion of these onshore reinforcements has often taken longer than the completion of the offshore wind farms for which they are being built. This could present a material barrier to the delivery of UK Government ambition to deliver up to 50GW of offshore wind by 2030."

17. Para 3.3.83 (EN-1 2024) then provides that "Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new and particularly low carbon NSIPs to be brought forward **as soon as possible** given the crucial role of electricity as the UK decarbonises its economy." (emphasis added).

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[2] The paragraph emphasises that the need for onshore transmission may need to be supplemented by Offshore connection also- exactly the strategic option taken by NGET in this case where the combination of NTT and Sealink were identified as the best fit for the statutory and policy requirement to meet the need for additional network infrastructure in East Anglia.

18. Paragraph 4.2.5 then importantly defines what it means by low carbon infrastructure **"for the purposes of this (CNP) policy".**

19. It provides that: "all onshore and offshore generation that does not involve fossil fuel combustion" and **"all power lines in scope of EN-5 including network reinforcement and upgrade works and associated infrastructure such as substations" (emphasis added).**

20. For the avoidance of all doubt, the EN makes clear that the CNP policy applies to ALL power lines caught by EN-5 including those not specifically associated with a particular generation technology "as all new grid projects will contribute towards greater efficiency in constructing operating and connecting low carbon infrastructure to the National Electricity Transmission System."

21. EN-1 presented to Parliament in December 2024 (EN-1 2025) is even clearer. It says that paragraphs 4.2.17 and 4.2.18 of the new EN-1, set out the projects to be prioritised for the Clean Power mission and net zero. It repeats the contents of para 4.2.4 (2024) about CNP policy applying to all power lines in scope of EN-5 set out above and says: **the CNP policy "applies to these projects."**

22. In the present case, the proposed power line is, on all parties' cases on this issue, clearly in the scope of EN-5. That is sufficient by itself to mean and very clearly to mean that the CNP policy applies to the Project and the particular means of delivering the Project. The National Policy Statement could not be clearer.

23. As a matter of fact this Norwich to Tilbury power line proposal is **also** associated specifically with the delivery of low carbon off-shore wind generation to the network. It serves the very specific purpose of facilitating specific low carbon generation and at the same time contributes to greater efficiency in constructing operating and connecting the system as a whole and in this respect is especially important to the meeting of the CNP.

24. The CNP **policy** thus undoubtedly applies to the Project under Examination and to all elements of it.

25. Whether and to what extent the **presumptions** set by the CNP policy framework applies in a particular case will depend upon case-by-case and topic-by-topic analysis of a CNP policy project as set out in para 4.2.14 EN-1 (2024).

26. The CNP **presumptions** are set out in 4.2.15 et seq EN-1 (2024) and include the presumption that except in named circumstances such as national defence impacts or habitat interests secured by Treaty, **in all but the most exceptional of circumstances it is unlikely that consent will be refused on the basis of these residual impacts after the mitigation hierarchy has been applied.**

27. The strength of the presumptions is made clear by the provisions of EN-1 (2024) para 4.2.17 which emphasise that as a starting point the benefits of CNP infrastructure are capable of providing the relevant justification for outweighing of harm, exceptionality or very special circumstances to justify development including:

    a. Causing Green Belt harm;
    b. Impacting on SSSI;
    c. Exceptionally in nationally designated landscapes; or
    d. Causing substantial harm or loss of significance of heritage assets.

28. This Examination is of course considering these matters as the Examination proceeds.

29. So, and as but an example of the operation of the CNP presumptions, if residual **defence** impacts were to occur and could not be appropriately mitigated, then such residual harms would be treated on their merits in a normal planning balance and the "in all but the most exceptional circumstances" presumption of consent notwithstanding these impacts (para 4.2.15 as referred to above) would not apply - but only in respect of that topic and the particular residual harm identified.

30. A similar exception applies where genuine public safety impacts which cannot be mitigated satisfactorily arise. In such circumstances, the "in all but the most exceptional circumstances" (para 4.2.15) presumption would not apply to that impact.[3]

31. In landscape and visual terms, the consideration of the impact of the particular means of meeting need and whether the inevitable landscape and visual consequences of large scale energy projects should be mitigated by the "means of provision" including undergrounding or sub sea caballing is dealt with in terms by EN-5 itself.

32. **EN-5 forms part of the CNP policy**. All power lines covered by EN-5 are CNP policy lines. EN-5 and its guidance on technology-specific provision of infrastructure is a specific, deliberate and integral part of the CNP policy.

33. In these terms the framework of policy read as a whole is simply not agnostic as to the "particular means" of meeting need as suggested by Mr Banner KC's opinion. Rather it sets a strong presumption as to the particular means best placed to meet CNP objectives (see para 2.9.20 EN-5 (2024). In so doing it clearly had in mind landscape visual impact, speed of delivery, cost, economic impact, the potential for precedential effect and other matters which are set out in the documents as a whole but in particular in EN5 (2024) at 2.9.25.

[3] Aerodrome safety does not give rise to such concerns because if and to the extent an aerodrome is unsafe, it will not operate in that unsafe manner.

34. EN-5 deliberately and pointedly identifies in 2.9.7 (2024) that the Government does not believe that the development of overhead lines to meet the pressing need is incompatible in principle with an applicants' duty under Schedule 9 to the Electricity Act 1989 to have regard to inter alia visual and landscape amenity and to reasonably mitigate possible impacts thereon[4].

35. Further EN-5 explains that there should (as part of CNP policy by definition- again all power lines caught by EN-5 are CNP) be a strong starting presumption that on shore overhead lines should, in general terms, be preferred as a means of transmission with that presumption only being reversed in national landscapes. EN-5 also (without displacing the strong presumption for overhead lines outside national landscapes) provides guidance on the "particular means" of meeting need in other sensitive locations where there is particularly significant landscape and visual impacts. All of this is, again, part of CNP policy.

36. Thus, the Project and all elements of the Project is CNP infrastructure and is the subject of CNP policy in EN-1 and EN-5. That policy identifies need AND the appropriate "particular means" in principle by which that need should be met. An analysis which engages with EN-1 and EN-5 holistically is not (as asserted by Mr Banner KC) eliding policy provisions stressing the urgency of need with the particular means of meeting that need as alleged. The CNP and related policy framework presents an holistic approach to the existence of real need and the most appropriate way of meeting that need in terms of technology choice or "means of provision".

Project Objectives

37. Mr Banner KC's second point suggests that the Applicant has failed to identify its Project Objectives (capitalised by Mr Banner KC) and to set out whether alternatives could meet project objectives (lower case used by Mr Banner KC). He suggests that the ExA shares this concern about the optioneering process and consideration of alternatives as expressed through its Rule 17 request (PD-012)

38. The Applicant does not recognise the alleged ExA concern with this dealing of alternatives issue in the Rule 17 request or at all.

39. There is no statutory requirement to identify formally something known as Project Objectives as part of the Planning Act 2008 process.

40. None were formally identified **as such in those terms** by the Applicant.

41. The need case for the Project is set out in a range of DCO application documents and is not set out again here.

[4] See Planning Statement [APP-085] section 1.5 for details of National Grid statutory duties.

42. Suffice it to say that need case for the Project is multi-limbed and complex. The Applicant relies on the need case for new electricity infrastructure set out in sections 3 of the 2024 and 2025 versions of EN-1. These emphasise the urgency of meeting that need, the requirement for secure electricity provision, for providing significant margins of supply over increasing demand for reducing national reliance on imported gas and oil as well as ensuring net zero targets are met (See EN-1 3.3.59 2024).

43. The preference for the strategic option chosen by the Applicant having regard to its statutory duties and the content of EN 1, 3 and 5 is also multilimbed and complex. It is set out in a number of strategic optioneering and backcheck reports (see APP-356, APP-357 -360).

44. The strategic preference is not set out in terms of specific Project Objectives but in a coherent assessment of environmental, socio-economic, technical and cost factors which reflects the Applicant's published methodology on such matters as well as the Applicants statutory duties under the Electricity Act 1989 and the provisions of EN1, 3 and 5.

45. The Application is not legally deficient in this respect. Any attempt to set or delimit or impose a single Project Objective or set of Project Objectives by the objector group against which all alleged alternatives are then fully tested is neither necessary nor appropriate to the Examination task in hand. The Panel is directed to the legal opinion on alternatives set out as a response to similar submissions at the application and "adequacy of consultation stage" of the process (REP1-007).

The importance of the 2025 EN suite

46. Mr Banner KC's third point deals with the weight to be given to the new suite of EN documents which Parliament has formally designated. Mr Banner KC states that they may be of "some general relevance" but that cannot be the basis for allowing an otherwise unacceptable application. He expresses considerable caution with the suggestion from the ExA that the new EN should be treated as an important and relevant consideration in decision making in accordance with section 104 of the Planning Act 2008 (2008 Act).

47. The Applicant does not agree with Mr Banner KC's characterisation. The new EN suite though not the EN suite "made" for the application has, as a matter of fact and law, been designated and published by Parliament. It represents the up-to-date and settled position of Parliament. Its subject matter is directly relevant to the matters before the Panel and represents the up-to-date position on a number of matters including new and up to date legislation which was not in place at the time of the 2024 suite of policy statements. The weight to be given to it in these circumstances is a matter for the Panel having regard to what the

policy documents themselves say. The Panel is clearly correct in its preliminary finding that it is an important and relevant consideration.

48. In its own consultation response on the new suite, the Government indicated that the purpose of the new NPSs was to ensure they reflected the Government's energy priorities more clearly. These priorities were set out in the Clean Power 2030 Action Plan: a new and important document upon which there was no direct position in the previous EN suite.

49. Further and as a result, the 2025 EN suite places greater emphasis on the delivery of a policy which now has statutory backing. The weight to be applied to the benefits of renewable energy projects in improving security of supply and meeting net zero goals has, as a result, been increased from significant to substantial.

50. Insofar as meeting the need for CNP was already an essential part of the existing EN-1- 5, a strengthening of the weight to be given to meeting that need does not cut across or countermand a finding that the proposal accords with the earlier NPS. Indeed, the strengthened position in relation to meeting CNP need would further enhance the extent of accordance with the relevant national policy statement for the purposes of s 104 of the Act.

51. The Government certainly takes the view that the new EN suite was necessary and relevant. It states in its consultation review (Consultation Response Planning for New Energy Infrastructure 2025 Revisions to National Policy Statements for energy infrastructure) that "the Government published the Clean Power 2030 Action Plan on 13th December 2024 which sets out an ambitious package of legislative and non-legislative reforms to the planning system to ensure the Clean Power 2030 target is achievable. The updates to the energy NPS are an important step in achieving these targets."

52. The correct approach to newly published NPS which do not have statutory effect is exemplified by the approach of the Secretary of State in deciding the Heckington Fen Solar DCO project (see para 2.2.27 of that decision).

53. The new 2025 suite of EN documents is an important and relevant material consideration in the determination of the Project. It underscores the compliance of the proposal with the provisions of the 2024 EN suite when read as a whole.

[redacted]

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